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Where to wriggle? Norwegian politicians' presentations of autonomy within the EEA association

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ABSTRACT

Perceptions of the 'wriggle room' within the framework of European integration might have significant implications for both public opinion and policy choices, as exemplified by the Brexit process. Examining how ideas of a wriggle room are presented to the public is therefore important, and even more so for arrangements of external differentiated integration, where formal access to EU decision-making is restricted. Through examining how Norwegian politicians have presented the wriggle room within the EEA association in the period 1987–2022, the article shows how such presentations vary. It is argued that these are not only dependent on the legal-institutional framework of the agreement, but that the parties' positions on the EEA association and on European integration in general condition their presentations.

KEYWORDS External differentiated integration; EU politicisation; wriggle room; Norway–EU relations; European Economic Area

Ideas about the 'wriggle room' within the framework of European integration have received renewed attention since the United Kingdom's decision to leave the EU and the negotiations that followed, as it highlighted both debates about the scope for national autonomy within the framework of EU membership and within alternatives to full membership in the form of different arrangements of external differentiated integration (EDI). Following up on this, scholars have asked what the *actual* scope for autonomy is within commitments to EU legislation and how such flexibility is used, both in relation to EU member states (e.g. Princen *et al.* 2024; Zhelyazkova 2024) and other associations such

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as the European Economic Area (EEA) and the EU–UK Trade and Cooperation Agreement (TCA) (Fossum *et al.* 2023).

Meanwhile, the wriggle room as a concept is not only interesting in terms of whether the scope of action within different forms of association with the EU is legally and politically confined. It is also interesting as a rhetorical concept, as in how this wriggle room is presented and perceived publicly. National politicians have considerable scope to interpret and present what the national scope of autonomy is, both more generally and in relation to specific issues. As such ideas are presented to the public, they may have consequences for the politicisation and depoliticisation of European integration with critical implications. The Brexit debates, with the 'take back control' argument at its core, exemplifies how perceptions of a wriggle room may play a central role in public debates. In essence, when dealing with unpopular policies at the national level, if the wriggle room is understood as narrow, one might risk politicising the wider framework of European cooperation – be it membership of the EU or other arrangements of external differentiation. This raises the question of how the ideas of a wriggle room are presented in public debates.

Such debates about the wriggle room are likely to be even more important in the context of arrangements of external differentiated integration where the rights to participation in EU decision-making are restricted, where EDI is seen as a durable alternative to full membership, and where European integration is politicised. As such, in a situation where arrangements of external differentiation have gained increased importance both with the exit of the UK and with renewed debates about the future of European integration after the full-scale Russian invasion of Ukraine (Telle *et al.* 2024), the need to examine how arrangements of EDI are understood has become even more relevant given its likely consequences for public support and debates about EDI.

The Norwegian association to the EU through the European Economic Area is as such an interesting case for the study of presentations of the national wriggle room. Norway's association to the EU, incorporating Norway in the EU's internal market since 1994, is among the longest and deepest forms of external differentiation. Following the rejection of EU membership in the 1994 referendum, the EEA association became a durable alternative to membership, but it is still contested by Norwegian politicians. We also know that there are considerable debates about the wriggle room in Norway, with the latest governmental report on the EEA association as an illustration of the centrality of the term (NOU 2024:7). Yet, there has been no systematic analysis of how the wriggle room as an idea has been presented by Norwegian politicians and how this has changed over time.

This article asks how the national wriggle room within the EEA association has been presented by Norwegian politicians in the period

1987–2022. Through a thematic analysis of political documents from this period, we assess how parties have presented such a wriggle room with regards to *whether* there is one and in *what parts* of the EU/EEA policy process it is identified. We find that there is considerable variation in how the parties present the wriggle room across the different phases of the policy process. Consequently, we argue that there is considerable leeway in how the national wriggle room can be presented. Although the legal-institutional framework is an important factor, such presentations are also closely linked to the parties' positions on the EEA affiliation and European integration in general.

In the first part of the article, we define wriggle room as a theoretical concept and discuss how it relates to politicisation of European integration. Second, we argue that such debates are particularly relevant in the context of EDI. Third, we set out our expectations for how parties' positions on the EEA affiliation and on European integration and the legal-institutional framework of the EEA association might condition presentations of a national wriggle room. In the second part of the article, we present our data and methods, before we move on to how Norwegian political parties have presented the wriggle room with regard to four central policy phases within the EEA framework. Finally, we conclude by summing up our findings and discussing what lessons can be drawn from the Norwegian case.

The national 'wriggle room' as a concept

Discussions about how European integration constrain national politicians' scope for action is not a new phenomenon in academic circles. It is essential to questions of how national politicians delegate power to the European level which constrain their legal scope for actions (e.g. Franchino 2004) and how member states comply with such rules (e.g. Börzel 2021). Already in 2003, Iankova and Katzenstein (2003) argued that 'institutional hypocrisy', referring to how a discrepancy between 'legal fiction and political reality' is allowed, is a systematic feature of the EU. However, as concerns over national sovereignty have gained increased attention in public debates, so have questions related to how EU rules not only constrain national politicians, but also leave scope for national politicians to pursue their policy goals within a framework of European integration. Recent debates have mainly focused on member states' scope of 'government autonomy' in the implementation of EU directives (Zhelyazkova 2024; see also Princen *et al.* 2024). With regards to countries outside the EU, debates have taken a broader perspective, asking how third countries might influence EU policy from outside (e.g. Lavenex and Öberg 2023) or what autonomy countries closely associated with the EU have within the framework of their associations (Fossum *et al.* 2023, 2024).

The concepts and terms used to address the scope of national actors' autonomy within EU associations are manifold, as the above shows. For our approach, we find Fossum *et al.*'s definition of the 'wriggle room' useful. 'Wriggle room', they argue, refers to 'the scope for autonomous choices within formal legal commitments and constraints' (Fossum *et al.* 2023: 3). This understanding of 'wriggle room' covers both a *positive* and *negative* scope for action: positive, in the sense that the wriggle room includes 'the actor's ability to set forth one's own preferred options' (Fossum *et al.* 2023: 26), and negative in the sense that the association framework restricts the scope for action. Whereas Fossum *et al.* apply the concept to examine the actual or potential wriggle room within third countries' relations to the EU, we find their definition useful also for a study of the wriggle room as a rhetorical concept.

The existing literature has looked at the scope for action in different stages of the policy cycle. As seen above, recent literature on member states have focused on the implementation phase (Princen *et al.* 2024; Zhelyazkova 2024). With regards to non-member states, Lavenex and Öberg (2023) argue that 'third country influence can potentially occur at all stages of the policy cycle from the agenda-setting phase to the formulation, adoption, implementation and enforcement of EU laws and policies' (1441). Similarly, Fossum *et al.* (2023) discuss the wriggle room in relation to 'policy initiatives, range of alternatives, involvement in actual decision making, implementation and transposition, and feedback/learning' (25). Important for the concept of a 'wriggle room' is that such influence needs to happen within some framework of legal constraints. Whereas the above examples show how a broader conceptualisation of the wriggle room that covers different policy phases is important to fully capture how the wriggle room can be understood, it is important to see this in light of the formalised constraints and opportunities different associations grant states, as we will come back to later in this article.

Why presentations of a wriggle room matter

As mentioned in the introduction, presentations of a national wriggle room can be linked to the politicisation of European integration. Perceptions of the ability to follow up on national policy preferences within the framework of an EU affiliation may influence support or opposition towards the affiliation itself. This assumption follows up on Mair's (2007) argument that opposition towards EU policies can spill over into opposition towards the EU as a polity, based on the premise that the EU is lacking in channels for expressing such opposition. As he writes, '[t]o be critical of the policies promulgated by Brussels is therefore to be critical of the polity; to object to the process is therefore to object to the

product' (2007: 7). Underpinning this is the notion that perceived influence in policy processes shapes the legitimacy of both EU policies and the EU as a polity (see also De Wilde *et al.* 2016), a logic we argue also fits with the concept of a wriggle room as it regards the scope of action for channelling policy preferences.

National politicians have a vested interest in and actively engage with influencing perceptions of who are responsible for policies. The general literature on 'blame games' argues that as politicians do not want to be blamed for unpopular policies, they shift the blame for such policies onto others (Hood 2011; Powell 2000; Weaver 1986). The EU creates an important new venue for such blame games as the EU as a multi-level system creates considerable unclarity about who is responsible for policies. Such unclarity may be utilised by politicians at the national level (Heinkelmann-Wild and Zangl 2020; Hobolt and Tilley 2014). Presentations of a wriggle room is ultimately about where the responsibility for policies should be placed: If there is no wriggle room for national politicians, in the sense that there are no policy options available, one can also not blame national politicians for policies – instead the blame is directed towards the European level. However, as we will come back to, we do not necessarily expect 'blame avoidance' to be the most important dynamic conditioning how national politicians present the wriggle room.

Our assumptions about the relationship between presentations of a wriggle room and politicisation is substantiated in the empirical literature. One of the most obvious examples of how politicians might interpret and present the wriggle room differently is found with the example of EU freedom of movement and how it has been politicised after the 2004 enlargement of the EU. Leading up to Brexit, the Leave campaign's 'take back control' slogan was built on the notion that there was no room for manoeuvre within Britain's relationship to the EU on the free movement. In a comparative study of the politicisation of the free movement in the UK and Germany, Roos shows how a corresponding discourse was not established in Germany, as 'the idea that FOM leads to a loss of control over immigration was never raised by the politicians who participated in the debate' (2019: 641). He argues that the Social Democrats and the Christian Democrats managed to contain increasing contestation of intra EU-migration as linked to 'welfare tourism and abuse' through domestic responses: 'Careful framing strategies and the creation of expert committees to rationalise and channel criticism into constructive domestic response are effective de-politicisation strategies with regard to EU issues' (2019: 646; see also Blauberger *et al.* 2023). This illustrates how politicians play an important role in shaping the notion of a wriggle room nationally, both through their communication and through their policy responses. It also shows how perceptions of a wriggle room is linked to the

politicisation of the EU as a polity, either in terms of the contestation of specific policy areas, such as the free movement, or EU membership more broadly.

Presentations of the national wriggle room in EDI arrangements

The politicisation of European integration is central as an explanation for demands for less integration, and as such a driver of both internal and external differentiation (Leuffen *et al.* 2021). While we on that basis hold that our theory about presentations of the national wriggle room is relevant across all forms of European integration, we expect it to be even more important for arrangements of EDI, as the access to formal channels of influence is limited relative to member states, primarily because participation in the EU's central decision-making bodies is reserved for full members (Lavenex 2015). EDI arrangements thus offer a more limited scope for action, with less opportunities for third country politicians to follow up on their policy goals and with citizens of these states having less opportunities to channel opposition within the EU system and hold national politicians responsible. Meanwhile, we also expect debates about a wriggle room to be more important within certain forms of EDI based on three conditions.

The first condition is the degree of legal commitment to alignment with EU rules. EDI arrangements include variation in the extent to which non-member states are formally obliged to adopt parts of the acquis communautaire (Telle *et al.* 2024). With higher degrees of such sovereignty transfers, entailing broader commitments to uphold EU rules and thus limiting the scope for legal action, we expect debates about the wriggle room to be more likely.

Second, the temporal dimension of EDI arrangements is also likely to matter for whether there are debates about the wriggle room. It seems likely that a limited scope for influence would be easier to accept if the state is seen as transitory rather than permanent.

Third, and related to this, we also expect that there are more debates about the wriggle room if European integration is politicised, i.e. if there are several alternative forms of association that are seen as relevant in the national debates, implying a willingness to also debate the current form of association.

Because of this, we see Norway's relationship to the EU through the EEA agreement as a most likely case for debates about the wriggle room. The agreement, which includes Norway, Iceland and Liechtenstein in the EU's internal market, involves considerable transfer of sovereignty: The agreement obliges the non-EU member states to implement EU laws

regulating the internal market, but these states have no vote when such laws are made. Although the EEA agreement was not meant to be a permanent solution, it has, since Norway rejected membership in the 1994 referendum, effectively been that, and has now been in force for over 30 years. Finally, European integration has been and remains a controversial issue in Norway, as illustrated by the marginal vote in the two referendums on membership and the diverging positions of Norwegian parties (see below).

This theoretical framing of the Norwegian case is however also accompanied by observations of the relevance of debates about the wriggle room in the Norwegian context. The scholarly literature both points to how there have been lively debates about the 'wriggle room' in Norway and also engages with these debates (e.g. Eriksen 2023; Rye and Graneng 2023; Sending *et al.* 2021; Stie 2013; Sverdrup 2009; Trondal and Stie 2015). The debates revolve around what this wriggle room is, when it applies, how it is or may be used, and what consequences perceptions of such a wriggle room have. But whereas it has previously been highlighted that political considerations may play into perceptions and presentations of the wriggle room in the Norwegian context (Rye and Graneng 2023; Stie 2013), there has so far been no systematic analysis of this across parties and across time.

What is likely to condition politicians' presentations of a wriggle room?

Whereas the above sets out expectations for when we might expect to see debates about a wriggle room at the country level (and thus why we see Norway as a relevant case), the main focus of this article is at the level of party politicians: How might we expect presentations of a national wriggle room to vary across politicians? We argue that two factors are likely to be particularly important. First, the parties' preferences for the country's relations to the EU, and second, the legal-institutional structures of the current arrangement.

Party positions on EU affiliation

As set out above, a narrow perception of the national wriggle room might lead to dissatisfaction with the current association arrangement. Because of this, we also expect politicians' positions on European integration to influence how they present the wriggle room to the public, as such presentations might affect the public's support for the politicians' preferred alternative. Hence, we would expect parties supportive of the status quo to emphasise the existence of a wriggle room within the current

arrangement, whereas we would expect parties who seek an alternative – regardless of whether it entails more or less integration – to present the wriggle room negatively.

Normative considerations

While the above sets out our main expectations based on the parties' positions on European integration, normative considerations might also influence presentations of the wriggle room. If the wriggle room is interpreted as too broad, it might lead to non-compliance with the commitments of EU law (see Eriksen 2023 on the Norwegian benefits scandal). As Börzel (2021: 45) argues, 'Euroscepticism should increase the propensity of domestic audiences and veto players to pull states away from rather than towards compliance with EU law'. Taking this into account, we might also see the relationship between parties' positions on European integration and their presentations of a wriggle room play out reversely to the expectations set out above – with pro-European integration parties being more hesitant to presenting ideas of a wriggle room that might ultimately challenge the application of EU norms. As we will come back to below, we expect this to play out differently across different phases within the policy processes of the EEA association.

In the Norwegian context, this assumption is further strengthened by the 'gag rules' of consecutive governments on EU affiliation. The cross-cutting nature of the issue of European integration has been a challenge for the cooperation of Norwegian parties. All coalition governments in Norway since the early 1990s have therefore had 'gag rules' to keep the issue of European integration off the table, agreeing on the EEA agreement as the basis for Norway's relations to the EU and on keeping the issue of membership off the table (Fossum 2010; Fossum *et al.* 2023: 168–9). This has effectively kept alternatives to the EEA association off the political agenda, and might in turn have made debates about the wriggle room within this framework all the more important.

The positions of Norwegian parties

Norwegian parties' positions on the affiliation to the EU is no straightforward matter. Although they broadly can be sorted in three categories based on their preferential affiliation – pro-membership (with EEA as a secondary preference), pro-EEA (either as the sole preference or with membership as a secondary preference) and anti-EEA (i.e. calling for a looser affiliation) – these preferences, as they have been expressed in public debates, have changed over time, particularly with regards to what the parties have emphasised as their primary position. Figure 1 provides an overview of the first preferences of the Norwegian parties

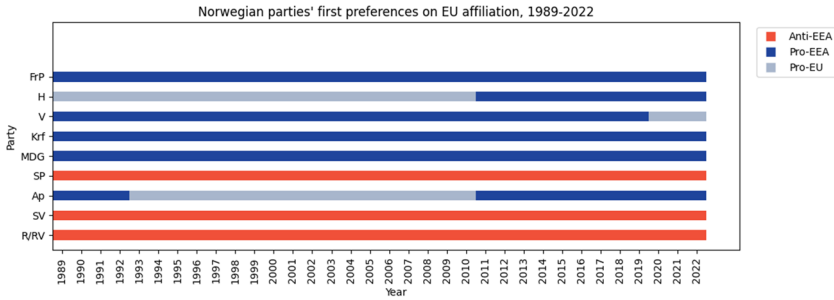

Figure 1. Norwegian parties' first preference on EU affiliation as expressed in public debates, 1989–2022. The parties are listed from right (top) to left (bottom).

over time. The figure starts in 1989, as this was when the parties first began to clarify their positions on the new form of association that would become the EEA, as it was in January this year that Jacques Delors launched the proposal for a new form of association that would become the EEA agreement.

The most notable change happened in 2010/2011. With the onset of the Eurocrisis, there was a dramatic fall in public support for Norwegian EU membership (NOU 2012:2: 277). This caused a perception among the dominant Yes parties of a greater need to rally behind the EEA, with both the Labour Party and the Conservative Party moving away from EU membership as their first preference and rather emphasising their support for the EEA agreement (Rye 2013: 185). Another notable shift was the change in the Liberal Party from advocating for EEA to making EU membership their first preference in 2020. There has also been a shift in the position of the Progress Party, which in 2017 came out against EU membership. They still support the EEA alternative, but with calls for renegotiating it. As such, we expect to see a shift also in the presentations of the wriggle room of these parties in accordance with the changes in their preferred association as expressed in public debates.

The legal-institutional framework

Whereas there generally is a wide scope for different presentations of a wriggle room as concerns European cooperation, such notions must also take into account the institutional and legal context in which the cooperation takes place. We expect that presentations of a national wriggle room vary with the form of the relationship that the country in question has with the EU and what kind of access the relationship grants in different stages of the policy-making process.

Table 1. Overview of our expectations of parties' presentations of a national wriggle room across the policy phases.

Policy phase	Wriggle room as identified in previous studies	Pro-EU membership	Pro-EEA	Anti-EEA
Policy-formulation	Participation in expert groups Participation in the comitology process	–	Positive	–
Decision-making	None	Negative	–	Negative
Incorporation in the EEA agreement	Formal right for the EEA3 countries to reserve themselves against EU law.	Negative	Negative	Positive
Policy-implementation	Flexibility during implementation of EU legislation.	Positive/Negative	Positive	Negative

In the Norwegian case, this relationship is primarily regulated through the EEA agreement. The form of this association is strongly shaped by the concerns of the EU with maintaining its decision-making autonomy on one hand and the EEA3's concern with maintaining national sovereignty on the other (Frommelt 2020; Rye 2019). In consequence, the EEA is organised in a two-pillar structure, where the EEA3 constitutes one pillar and the EU the other.

In our analysis, we focus on the policy-formulation, policy-decision and implementation phase, as these are the phases of the EU policy cycle (Young 2015) that are regulated in the EEA agreement. We also include the incorporation of EU legislation in the EEA agreement as a distinct phase. Table 1 provides an overview of the legal-institutional wriggle room of the EEA3 states in these four phases, as identified by existing literature. It also sets out our expectations for how we expect Norwegian politicians to present the wriggle room across these phases. In the following we discuss this in more detail.

The policy-formulation phase

The policy formulation phase is the phase where specific proposals for action are being formulated (Young 2015: 47), We understand the wriggle room in this phase as the scope for contributing to shaping EU policy before it is adopted (see Frommelt 2020: 9). This phase begins when a decision has been taken to address a particular issue, e.g. when the European Council in a conclusion invites the European Commission to draft a policy strategy or legislative proposal. The access of the EU member states and EEA3 countries to the shaping of EEA relevant legislation is formally equal.

The EEA agreement obliges the Commission to informally obtain views from experts in the EEA3 states in the same way as it obtains views from experts in EC member states when it prepares its proposals. The EEA3 countries also have the right to participate in the Commission's

committees for the development of supplementary regulations (comitology), which develop the regulations for the implementation of directives and regulations adopted by the European Parliament and the Council. Comitology formally belongs to the policy decision phase of the EU policy cycle. From the perspective of the EEA3 countries, participation in the development of supplementary regulations still comes in the form of decision-shaping, as these countries only have observer status in these committees and are not allowed to participate in voting.

In this phase, we expect the presentations to follow our general expectations for how presentations of the wriggle room vary across parties. We expect pro-EEA parties to emphasise the possibility of influencing EU legislation in the policy formulation phase. Whereas we expect this to be less the case for the pro-EU membership and anti-EEA parties, we do not expect them to actively present the wriggle room as limited in this phase, because of the access to policy formulation processes granted to Norway.

The policy-decision phase

The EU internal market is governed by the Ordinary Legislative Procedure (OLP) where the Commission has the right to initiate legislation and where the passing of legislation requires agreement both in the Council and in the European Parliament (Copeland 2021: 70). Participation in EU decision-making is the prerogative of EU member states. As formulated in the 1987 Interlaken principles, the EU has always practised the principle that its decision-making autonomy must be preserved (Rye 2019: 145). Consequently, the EEA3 does not participate in the adoption of EU law that is relevant to the EU internal market. Because of the lack of access to EU decision-making, we expect that none of the Norwegian parties will present a positive wriggle room in these processes, but we expect pro-membership and anti-EEA parties to emphasise the lack of access.

Incorporation of EU legislation in the EEA agreement

As mentioned, the EEA association is set up in such a way as to protect the autonomy of EU decision-making, whereas it also upholds the formal sovereignty of the EEA3 countries. EEA-relevant EU legislation must be incorporated in the EEA agreement through decisions in the EEA Joint Committee. Such decisions must be taken with consensus among the EEA3 countries and the EU. Frommelt argues that this decision-making process offers a considerable wriggle room because it allows the EEA3 countries 'to delay the incorporation of new EEA-relevant EU legislation into the EEA agreement and to make EEA-specific adaptations' (2020: 3).

In theory, this mechanism also offers the opportunity to prevent new legislation from being included in the EEA agreement. Article 102 of the

EEA agreement describes the procedure should the EEA Joint Committee not reach an agreement to incorporate new EU legislation into the EEA agreement. It states that in case of non-agreement the affected part of the agreement shall be regarded as provisionally suspended. Although the EU has invoked Art. 102 twice, the full procedure within the agreement has hitherto never been applied in practice (Frommelt 2020; Pelkmans and Böhler 2013: 53).

The procedure set down in Article 102 is commonly referred to as the 'right of reservation', or even 'the right to veto', in Norwegian political discourse, and it has been central in previous analyses of how Norwegian governments have presented the wriggle room. Whereas the Stoltenberg II government emphasised the possibility of opting out from EU regulations as a way of actively engaging with European affairs (Stie 2013), the Solberg I government stressed the importance of accepting decisions made in the EU as a precondition for a well-functioning relationship between Norway and the EU (Rye and Graneng 2023). This creates expectations that are contrary to our general assumption: Here, we expect normative considerations to play a role. With regards to the right of reservation, we expect pro-membership and -EEA parties to be more likely to present a limited wriggle room, whereas we expect anti-EEA parties to emphasise this right.

The policy-implementation phase

In the EU, the implementation phase opens once a decision has been taken. As mentioned earlier, it is mainly within this phase a wriggle room has been debated in the scholarly literature, primarily in relation to flexibility with regards to directives which require incorporation into national law before they can be translated into practice (Zbiral *et al.* 2023). In the EEA3 states, both regulations and directives must be incorporated into national law. Regulations are incorporated in their original form, and an official report on Norway's relations to the EU stated that there 'is no national wriggle room' in the incorporation of regulations (NOU 2012:2: 123).[1] As pointed out by a 2024 official report on Norway and the EEA, the growth in the number of regulations in the last decade has been much stronger than the growth in the number of directives (NOU 2024:7: 41). Consequently, the wriggle room in this policy phase has decreased for both the EEA3 and EU member states. All the same, the EEA3 countries are, equal to EU member states, free to implement directives as they see fit. We expect this flexibility to be emphasised by pro-EEA parties, whereas anti-EEA parties are more likely to emphasise the lack of a wriggle room in the implementation of EU legislation. With regards to pro-membership parties, it might play out in both directions, depending on whether it is support for their preferred alternative or the upholding of EU norms that are most important.

Data and methods

In our study, we explore how Norwegian politicians have presented a wriggle room within the EEA association in the period 1987–2022. This period opens with the Norwegian government's reaction to the EU's decision to complete the single market in the form of a 1987 white paper to the Norwegian Parliament. It continues with the launch of the idea of, and subsequent negotiations for, a European Economic Area, following Commission president Jacques Delors' January 1989 speech to the European Parliament. The final phase of this period is the phase where the EEA agreement has been in force, from January 1994 until the present day. Hence, this period spans the entire period where the relationship to the EU internal market has been on the agenda in Norway, and thereby allows us to examine the development in presentations of the wriggle room over time.

The prime focus of this article is on *principled* notions of a wriggle room rather than on how the wriggle room has been perceived in relation to specific policy issues. Consequently, we have analysed political documents which we assume are most likely to contain such general statements, and that are central in informing public debates about European integration in Norway. We build our analysis on the NORWEU database (Graneng and Rye 2025), which consists of political documents on Norwegian European affairs in the period of interest (N: 370). Whereas we have used the entire database to identify explicit references to the term 'wriggle room', we have chosen to focus on three types of documents for our qualitative analysis of how such notions are expressed by politicians, as seen in Table 2.

These documents contribute to our research goals in different ways. The addresses of the government to the parliament are typically rich statements, which provide information on the overarching perspectives of the current government on Norway–EU relations as well as on specific issues. However, these accounts are not well suited to distinguish between the positions of the political parties, as only a few parties are represented in these accounts. They are also limited to a shorter time period (2007–2022). To encompass both a longer period and to examine the more principled positions of the individual political parties, we included all party manifestos of the parties represented in parliament. The last type of documents covered is plenary debates on European affairs in the Parliament. The database includes all plenary debates on relevant white papers and addresses to the parliament on European affairs. The speeches given in these debates provide more in-depth information on the parties' reflections on the wriggle room. All debates on the white papers where coded, whereas we did a systematic sampling of the debates following

Table 2. Overview of manually coded documents.

Type of document	Period	Number of documents, full population	Number of analysed documents
Government's addresses to the Parliament on EEA/EU affairs	2007–2022	32	32
Parliamentary debates on European affairs	1999–2022	37	14 (113 speeches)
Party manifestos (sections on EU/EEA)	1989–2021	73	73

the addresses. The speeches were coded as separate documents. In total, our qualitative analysis is based on 119 documents. For more details on the documents and sampling strategies, see the codebook (Online Appendix).

Our analysis builds on a combination of quantitative content analysis and thematic analysis. A first step in our analysis was to identify the appearance of terms related to 'wriggle room' across the database. For this, we used a Python script.[2] Secondly, we conducted a qualitative thematic analysis of our selected documents based on the codebook. We used the software NVivo for the analysis. We operationalised references to the wriggle room as any statements that either explicitly referred to the wriggle room or included references to actual or potential actions that may or may not be made to promote Norwegian interests within the EEA association. We differentiated between neutral, positive and negative presentations of the wriggle room. The statements were also coded based on how they relate to the four policy stages described above. We coded the segments of the text that contained such statements in NVivo. In addition, all codes relating to the wriggle room were aggregated at the document level as binary variables (*present – not present*). Our analysis was done on the basis of principles of collaborative thematic analysis (Richards and Hemphill 2018), particularly through the use of a codebook and the method of constant comparison (Corbin and Strauss 2008). The categories in the codebook were developed deductively on the basis of the theory but adjusted later in the process to accommodate relevant statements. We regularly met to discuss the coding throughout the entire process and adjusted our coding accordingly to ensure that our interpretations were reliable both across the authors and across time.

The notion of a wriggle room in debates among Norwegian politicians

The observation that the 'wriggle room' has taken on an important role in Norwegian debates about its relations to the EU is not new. Eriksen (2023) has affiliated the appearance of the notion of a wriggle room with the commissioned report on the EEA association from 2012, describing it

as a 'doctrine […] advocated most prominently' by the jurist Fredrik Sejersted, who led the commission behind the report and later became the Norwegian Attorney General (Eriksen 2023: 13). Our study shows that whereas debates about a wriggle room have indeed received increasing attention in the 2000s, particularly with regards to the explicit use of the term 'wriggle room', there have been vivid exchanges over the scope of action available in Norway's EU relations in the entire period of our study.

Figure 2 shows the percentage of documents containing keywords relating to 'wriggle room', across election periods from 1987 to 2022. Our findings show that the use of such terms within the debates has increased over time. These terms are used in a broader European affairs perspective and not only in relation to the wriggle room within the EEA association. When manually coding the documents, we found that the politicians often made references to the room for manoeuvre *outside* the framework of EEA, as a result of Norway not being an EU member state. For instance, the Centre Party in one of the parliamentary speeches alluded to the need to 'retain the political room for manoeuvre that we negotiated in the EEA negotiations' with reference to the increasingly blurred boundaries between what is considered EEA relevant and not, given how the EU has moved away from the three-pillar system the EEA agreement was originally based on (Stortinget 2008)[3]. Because of this broader use of the term, what is particularly interesting for our narrower understanding of a wriggle room is the *lack* of use of the keywords in documents in the earlier years of our period of study. The white paper from 1987 on

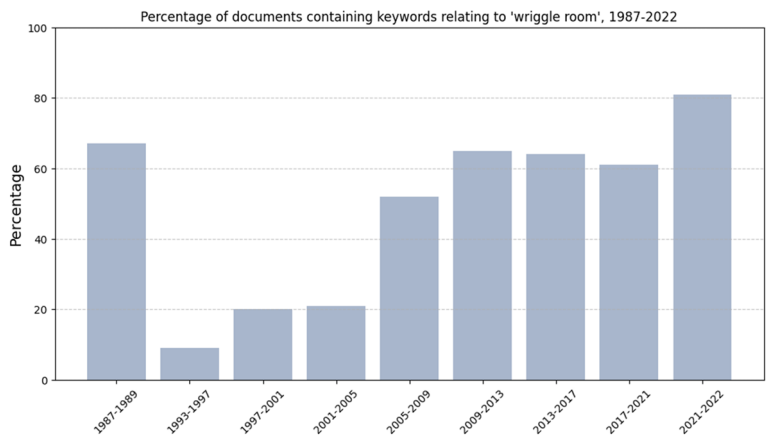

Figure 2. Share of documents in the NORWEU database containing keywords relating to 'wriggle room', by electoral period. N: 285.
Note: Government platforms and party manifestos were excluded to limit the use of the term in debates not related to European affairs. There were no documents included in the covered data for the period 1989–1993.

Norway, the EC and European cooperation did not contain any of the keywords. By comparison, the white paper on the *EEA agreement and Norway's other agreements with the EU* from 2012, which followed up on the commissioned report, contained 46 references to these keywords.

Whereas such explicit references to the term 'wriggle room' have clearly increased with time, we found, through our qualitative analysis, that notions of a wriggle room have been expressed in other ways since the entry into force of the EEA agreement. There have been debates about the scope for action within the Norwegian association since 1994, although there have been shifts in which phases of the policy-making process politicians have emphasised across this period. We will now turn to how the parties have presented the wriggle room in these phases – to whether these presentations are tied to notions of a positive or negative scope for action – and to how these presentations hold up to our initial expectations.

Policy-formulation phase

The wriggle room within the policy-formulation phase is the aspect of the Norwegian association that has received most attention from the political parties, but primarily from those either in favour of EU membership or the EEA agreement. Meanwhile, across these groups of parties, we find conflicting presentations of the scope for shaping EU policies. There has also been a shift in such presentations over time, with the changes in parties' positions on the EU affiliation.

The pro-EU membership parties the Labour Party and the Conservative Party initially highlighted the limitations of the Norwegian wriggle room in the policy-formulation phase. In the period up to the Eurocrisis, there are several examples of these parties expressing concern that changes inside the EU will reduce the Norwegian wriggle room or downplaying the importance of access to the policy formulation phase. The Labour Party pointed out, for instance, that Norway's wriggle room would be challenged by the European Parliament gaining more power (Stortinget 2001) and that more efficient decision-making processes in the EU would make it harder for Norway to influence EU policy-making (Stortinget 2007). The Conservative Party expressed concern that new initiatives in the EU were finding their solution outside the EEA agreement (Stortinget 2001) and lamented that Norway 'has to make do with accounts of the EU's many initiatives, and the Government's attempts to come into so-called close contact with the EU' (Stortinget 2007). As both the Labour Party and the Conservative Party's official positions were in favour of EU membership at the time, we see this in relation to the parties trying to argue that membership of the EEA gave Norway less wriggle room than a full EU membership would do.

Our findings are also in accordance with our expectations for the parties that had the EEA agreement as their first preference. Ever since the EEA agreement was conceived, the pro-EEA Christian Democrats emphasised the value of being able to participate in EU policy-formulation. Our analysis further discloses that as the Labour Party and the Conservative party made a shift towards promoting the EEA association, they also began to emphasise the value of participation in EU policy-formulation. This pattern is also clear in connection with cases that have been highly controversial in Norway, such as the EU's third and fourth energy market packages. On several occasions, the Conservative Party highlighted the importance for Norway of being able to influence the EU's energy market cooperation (Stortinget 2018a; 2019). The Labour Party, for its part, highlighted opportunities in the area of working life, to work actively to gain support in the EU for important elements of the Norwegian labour market model (Stortinget 2018b). This was however tied to a notion of a more limited wriggle room in the later phase of policy-implementation, as we will come back to later.

Overall, our findings for this policy phase strongly align with our expectations. We found almost no references to this policy phase in the communication from the anti-EEA parties. For the years after 2013, we were not able to identify statements that linked Norway's right to participate in policy-formulation to a negative wriggle room. In the period 1987–2022, there has been a growing tendency across parties to present the opportunity to take part in policy-formulation in positive terms, as parties have rallied around the EEA agreement.

Policy-decision phase

For the policy-decision phase, there is no disagreement among the parties about what the Norwegian scope for action is. In general, the Norwegian parties agree that the fact that Norway is not part of the EU decision-making process constitutes a significant democratic problem, at least in principle. Most of the statements regarding the scope of action with regards to decision-making was about the lack thereof. However, we found clear differences across the parties in whether they emphasised this.

Again, it is primarily the Labour Party and the Conservative Party, as proponents of EU membership, who emphasise this aspect of the association. As the Conservatives argued in a parliamentary speech in 2002:

> After eight years with the EEA agreement, we stand by our original position. Eight years with the EEA agreement has made it more evident that it is deeply challenging for Norway to compensate for the democratic deficit without being part of decision-making processes. With regard to the

> development in the EU, Norway can only secure voting rights and influence by becoming a full member. (Stortinget 2002)

The emphasis on the lack of access to EU decision-making was clearly linked to a call for joining the EU.

But also here, we observe that this line of argument is toned down after 2010/2011. When the option of EU membership seems no longer to be on the table, Labour and the Conservative Party toned down their criticism of the EEA agreement's lack of co-determination. Meanwhile, it should be noted that also parties who saw the EEA agreement as their preferred association did indeed acknowledge the challenges linked to the lack of participation in EU decision-making. The Christian Democratic Party was, for instance, clear that the lack of participation in EU decision-making was a weakness of the EEA-agreement. From this party's perspective this disadvantage was still a lesser evil than the restricted room for manoeuvre that would follow from participation in a common foreign policy, a common fisheries policy, a common agricultural policy and an economic and monetary union (Stortinget 2010). The anti-EEA parties, on the other hand, made few statements about this phase of the policy-making cycle.

As such, the presentations in this phase only partly fulfil our expectations: Whereas the shift in the presentations of the Labour Party and the Conservative Party support our general thesis, this is not the case for the other pro-EEA parties and the anti-EEA parties.

Incorporation phase ('right of reservation')

The politicians' communication on the incorporation phase, or the use of the 'right of reservation', is characterised by radically contrasting ideas of what the wriggle room is and how such reservation should be used. While the anti-EEA parties are united in their views, we see considerably more variation among the pro-EEA parties.

The anti-EEA parties have, regardless of whether they have been in government or not, maintained that the right of reservation must be exercised. The Centre Party and the Socialist Left Party have argued for the use of the right of reservation on a principled basis, claiming that this right must be used when fundamental Norwegian interests are threatened. Also, pro-EEA parties have presented a similar view. The Christian Democratic party has consistently emphasised the right of reservation as a quality of Norway's EU association that gives Norway a larger wriggle room than EU member states – a right 'that must be used when necessary' (Kristelig Folkeparti 2017). The Green Party has argued that the right of reservation must be used to ensure the room for manoeuvre to

pursue green policies (Miljøpartiet De Grønne 2017). An interesting case is the Progress Party. Whereas it in the 1990s and the early 2000s consistently emphasised the necessity of a unitary legislation with the EU, that is, against the use of non-adoption as a tool, it has over the last decade increasingly argued for the use of the right of reservation, particularly with regards to welfare export and border controls, i.e. in areas where the party has issue ownership. This has happened in parallel to a shift in the party's positions on European integration, with both a rejection of EU membership and a more critical stance towards the EEA association.

It is the parties who have been more favourable towards membership, the Labour Party and the Conservative Party, who primarily have presented a more limited wriggle room in terms of the possibility of using the right of reservation. These parties do not object to the right as a formal option but argue against using it because of the political costs with regards to the importance of maintaining a homogenous internal market. In other words, compliance with EU legislation is an explicit aim. Meanwhile, there are also tendencies towards a more positive view of exercising the right. In 2011, the Stoltenberg government decided that Norway should opt out of the EU's Third Postal Directive. This decision was reversed as the Conservative party entered government in 2013. It is, however, well known that the Labour Party's position was the result of a successful campaign on the part of its youth party, and that opposition in the mother party was considerable. A more recent, less special and thus arguably more interesting case is that this party has also been critical of adopting the EU's Fourth Rail Package. This may suggest a turn towards a greater willingness to exercise the right of reservation, but which seems issue-specific and driven by developments in EU policy cooperation, rather than based on more general positions on European integration.

As such, in this phase, we observe differences across the parties that are not as closely linked to their positions on the EEA association, but more aligned with their general stances on European integration and also conditioned by specific policies and conflicts within the parties. This somewhat contradicts our main expectations, but corresponds to our theorisation of normative consideration regarding the upholding of EU rules as a factor.

Policy-implementation phase

In the policy-implementation phase, we also find contrasting presentations of the wriggle room. On one hand, the parties opposed to the EEA agreement portray the association as a 'straitjacket'. A similar view is found among the pro-EEA parties who are against full membership. On the other hand, the parties in favour of the EEA association and EU

membership present the implementation of EU legislation as relatively flexible. Again, this is not strictly linked to their first preference of association, but also to more general positions on European integration and the need to comply with EU norms.

Both the Centre Party and the Socialist Left party express this sentiment clearly throughout the period. The Centre Party manifesto from 2005 provides a good example of this, stating that 'the EEA agreement leads to a continuously stronger alignment to the EU in ever more policy areas', which 'happens both through the passing of new directives, negotiations on the extension of the agreement, and through the interpretations of the legislation by the ESA and the EFTA court' (Senterpartiet 2005). The lack of flexibility in the legislation and the role of ESA, the EFTA Surveillance Authority, is a recurring topic. Meanwhile, it is interesting to note that also these parties emphasise flexibility in specific cases, particularly during their time in government, but with an underlying notion of this being *despite* the EU. As expressed by the Centre Party with reference to their defence of the 'right of reversion' (*hjemfallsretten)* and differentiated employer's tax: 'This shows how the red-green government in practice secures national interests through its European policy' (Stortinget 2013). This reads more as a representation of these parties of themselves as capable of following through on their European policy than the primary message being that there is a considerable wriggle room within the association.

The parties who prefer the EEA association to membership also tend to emphasise the limited wriggle room. The Christian Democrats does this both in general and in relation to specific cases but pointing out that 'the wish to secure identical implementation of legislation is not something that only impinges on the EEA/EFTA countries' (Stortinget 2002), implying that full membership would not be a better alternative. In parallel to what we observe with regards to the shift in their communication on the right of reservation, the need both to use and expand the scope for action on welfare legislation is a recurring theme from the Progress Party from 2013 onwards. This again speaks for some level of pragmatism in the presentations of the wriggle room, as driven by concerns over specific issues.

The pro-EEA parties who historically have been more favourable to membership emphasise the flexibility in the implementation of legislation. As stated by the Conservative foreign minister in 2019, 'EEA law is overall flexible and provides a scope for determining national arrangements, for instance to prevent work-related crime' (Søreide 2019). We also see this in relation to specific issues, such as the Labour Party arguing on the Postal Directive that 'there are no provisions in the directive itself that prevents us from retaining the values we want to protect' (Stortinget

2011) and later, referring to a court case on General Application, that 'the case shows how the EEA agreement provides us with a significant wriggle room in this area, and that the room for upholding the Norwegian labour market model is retained' (Eide 2013). Meanwhile, whereas they identify a scope for action, they do also emphasise the importance of homogeneous legislation with regards to the implementation phase, similar to the argument made with regards to incorporation in the EEA agreement. There are few examples of negative presentations among these parties: Both the Conservatives and the Labour Party do on occasions address the *need* for retaining a scope for action in their communication, but less often directly express that it *is* restricted. We found one exception to this pattern towards the end of our period, when Labour did point out that Norwegian labour market rules could occasionally be challenged in the face of the EEA agreement's rules on free movement (Stortinget 2018b). However, such statements only occurred before the revelation of the Norwegian social security scandal in the autumn of 2019, which made it clear that Norway had wrongfully practised rules that were in conflict with the EEA agreement's provision on free movement, acting as if the wriggle room was larger than what was actually the case.

Discussions and conclusions

Perceptions of a national wriggle room within EU relations might have considerable consequences for European integration. Understanding how and why ideas about such a wriggle room is presented to the public, potentially contributing to such perceptions, is therefore essential to better grasp how European integration might be politicised and contested. This is not only the case for EU member states, but likely even more so for arrangements of external differentiation, which entails considerable commitments to EU legislation yet does not include access to participation in EU decision-making, and which often stems from an unwillingness to give up national sovereignty.

This article has studied Norwegian politicians' presentations of such a wriggle room across four different phases of the EEA/EU policy process. It shows how there is considerable variation across parties both in whether they present the scope for action within the EEA association as negative or positive and how they emphasise this wriggle room across different policy phases. Whereas this largely corresponds to how previous studies have identified a potential scope for influence (e.g. Fossum *et al.* 2024), it also shows how there is significant leeway in how this wriggle room is presented within the legal framework of arrangements of EDI.

We argue that such presentations are largely conditioned by parties' preferred association to the EU: Whether the parties predominantly

support EU membership or the EEA association is important to whether they present the wriggle room within the EEA association negatively or positively. We argue that this is particularly apparent with the shift among the pro-EU membership parties around 2010/2011, with a corresponding shift in their presentations of the wriggle room. As such, the viability of alternatives to the current association seems an important factor for how the wriggle room is presented. As more integration is taken off the menu, in this case due to a shift in public opinion, the importance of emphasising the wriggle room within the association becomes more important in a context where national sovereignty has traditionally been highly politicised.

Meanwhile, such presentations also vary across the policy phases. In the latter phases, as legislation is incorporated into the agreement and implemented in national law, we observe different patterns in the presentations. Here, we argue, the commitment to upholding EU norms becomes a central topic of debate. The parties who are more positive towards European integration present the wriggle room as limited in both these phases, whereas those who are contesting the EEA agreement advocate for the use of the right of reservation but also claim that the agreement limits the possible scope for action in the implementation phase.

However, there are also certain exceptions to these general patterns. Our findings highlight how specific policy issues and legislative acts play a role for which ideas about the wriggle room are expressed in political debates. Whereas some of these have been used to highlight already existing discourses on the wriggle room, as with the Conservative party's communication on energy, other issues have been linked to contrasting ideas of a wriggle room: The most obvious from our analysis is the Labour Party's communication with regards to the Third Postal Directive. Not only are these debates interesting because they are linked to specific actions, such as the use of right of reservation in the case of the postal directive, but our findings suggest that such topics might also be part of explaining shifts in parties' presentations of a wriggle room more generally, perhaps most notable with the shift of the Progress Party. Future studies should look further into how specific issues are seen with regards to ideas about a wriggle room, both in a domestic and cross-country context. Given that politicians and the public alike place different salience on different issues and that the scope of integration also varies across issues, it is likely that presentations of a wriggle room vary across issues (see Zhelyazkova *et al.* 2024 for a similar argument with regards to compliance) – with potentially different implications for the perception of a wriggle room as a whole.

A limitation of the study is that, while we assume that there is a link between politicians' presentations of the wriggle room and public attitudes

towards European integration, we still know little about the relationship between such presentations, public perceptions of it and its impact on public attitudes towards different forms of European integration. Further studies should look more into how different perspectives on the wriggle room are expressed in other areas of the public sphere, such as in traditional and social media, and how such presentations inform public opinion.

What are the implications of our findings for external differentiated integration more broadly? Based on the nature of EDI, we would expect similar debates about the wriggle room to play out in other closely affiliated countries – particularly in Iceland, Lichtenstein and Switzerland, where the current association arrangements are also a consequence of reluctance towards sovereignty transfer and where the form of association has been relatively stable over time. Furthermore, we expect such debates not only to be a result of the legal-institutional framework, but to be shaped by factors both at the national level, such as controversial issues in domestic politics and changes in public attitudes towards European integration, and at the external level, such as alternative forms of association offered by the EU. In another contribution to this issue, for instance, Gstöhl (2024) notes how Swiss approaches to the 'wriggle room' might be changing in the context of the current negotiations of its association to the EU. Meanwhile, we still do not know much about how presentations of the wriggle room feature within national debates on EDI arrangements. Whereas this article is a first step in that regard, it also calls for a broader investigation into public presentations and perceptions of external differentiated integration.

Notes

1. The notion of a wriggle room for EU member states has however also been raised in relation to regulations (Blom-Hansen *et al.* 2021).
2. The search string used was ('handlingsrom*' OR 'handlefrihet*' OR 'handlefridom*'). The words correspond to the English 'wriggle room' and 'room for manoeuvre'.
3. All examples from the documents were translated from Norwegian to English by the authors.

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Data availability statement

The data set underlying the study is available from the authors upon reasonable request.

References

Blauberger, Michael, Anita Heindlmaier, Paul Hofmarcher, Josephine Assmus, and Birgit Mitter (2023). 'The Differentiated Politicization of Free Movement of People in the EU: A Topic Model Analysis of Press Coverage in Austria, Germany, Poland and the UK', *Journal of European Public Policy*, 30:2, 291–314.

Blom-Hansen, Jens, Jørgen Grønnegård Christensen, Caroline Howard Grøn, Michael Hansen Jensen, and Peter B. Mortensen (2021). *Det Nationale Råderum Ved Gennemførelse Af EU-Regler*. Copenhagen: Djøf Forlag.

Börzel, Tanja A. (2021). *Why Noncompliance: The Politics of Law in the European Union*. Ithaca: Cornell University Press.

Copeland, Paul (2021). 'The Ordinary Legislative Procedure in a Post-Brexit EU: The Case of Social Europe', *Politics and Governance*, 9:1, 69–78.

Corbin, Juliet M., and Anselm Strauss (2008). *Basics of Qualitative Research: Techniques and Procedures for Developing Grounded Theory*. Los Angeles: SAGE Publications Inc.

de Wilde, Pieter, Anna Leupold, and Henning Schmidtke (2016). 'Introduction: The Differentiated Politicisation of European Governance', *West European Politics*, 39:1, 3–22.

Eide, Espen B. (2013). *Stortinget - Møte tirsdag den 14. mai 2013 kl. 10 - Sak nr. 1*. Stortingets administrasjon, available at https://www.stortinget.no/no/Saker-og-

publikasjoner/Publikasjoner/Referater/Stortinget/2012-2013/130514/1 (accessed 2 December 2023).
Eriksen, Erik O. (2023). 'Three Modes of Administrative Behaviour: Differentiated Policy Implementation and the Problem of Legal Certainty', *Journal of European Public Policy*, 30:12, 2623–42.
Fossum, John Erik (2010). 'Norway's European "Gag Rules"', *European Review*, 18:1, 73–92.
Fossum, John Erik, Christopher Lord, Fay Madeleine Farstad, Arild Aurvåg Farsund, Merethe Dotterud Leiren, Espen D. H. Olsen, Marianne Riddervold, Johanne Døhlie Saltnes, Øyvind Svendsen, and Jarle Trondal (2023). *Norway's EU Experience and Lessons for the UK: On Autonomy and Wriggle Room*. Milton Park: Routledge.
Fossum, John E., Espen D. H. Olsen, and Jarle Trondal (2024). 'Innledning: Autonomi under Kompleks Gjensidig Avhengighet', *Norsk statsvitenskapelig tidsskrift*, 40:1, 1–7.
Franchino, Fabio (2004). 'Delegating Powers in the European Community', *British Journal of Political Science*, 34:2, 269–93.
Frommelt, Christian. (2020). 'Institutional Challenges for External Differentiated Integration: The Case of the EEA', [Working Paper]. European University Institute. https://cadmus.eui.eu/handle/1814/68538.
Graneng, Kristine, and Lise Rye (2025). *Data from: NORWEU, V1.0: Political Documents on Norwegian EU Policies, 1987–2022* [Dataset]. Sikt – Norwegian Agency for Shared Services in Education and Research. Retrieved from https://doi.org/10.18712/NSD-NSD3260-V1
Gstöhl, Sieglinde (2024). 'Switzerland's Intricate Differentiated Integration with the European Union: Bringing Governance (Back) In', *West European Politics*, https://doi.org/10.1080/01402382.2024.2397901.
Heinkelmann-Wild, Tim, and Bernhard Zangl (2020). 'Multilevel Blame Games: Blame-Shifting in the European Union', *Governance*, 33:4, 953–69.
Hobolt, Sara. B., and James Tilley (2014). *Blaming Europe? Responsibility without Accountability in the European Union*. Oxford: Oxford University Press.
Hood, Christopher (2011). *The Blame Game: Spin, Bureaucracy, and Self-Preservation in Government*. Princeton: Princeton University Press.
Iankova, Elena A., and Peter J. Katzenstein (2003). 'European Enlargement and Institutional Hypocris', in Tanja A. Börzel and Rachel A. Cichowski (eds.), *The State of the European Union, 6: Law, Politics and Society*. Oxford: Oxford University Press, 269–90.
Kristelig Folkeparti (2017). *KrFs Stortingsprogram 2017–2021*. Oslo: Kristelig Folkeparti.
Lavenex, Sandra (2015). 'The External Face of Differentiated Integration: Third Country Participation in EU Sectoral Bodies', *Journal of European Public Policy*, 22:6, 836–53.
Lavenex, Sandra, and Marja-Liisa Öberg (2023). 'Third Country Influence on EU Law and Policy-Making: Setting the Scene', *JCMS: Journal of Common Market Studies*, 61:6, 1435–53.
Leuffen, Dirk, Berthold Rittberger, and Frank Schimmelfennig (2021). *Integration and Differentiation in the European Union: Theory and Policies* (2nd edition). Cham: Palgrave Macmillan.
Mair, Peter (2007). 'Political Opposition and the European Union', *Government and Opposition*, 42:1, 1–17.

Miljøpartiet De Grønne (2017). *Miljøpartiet De Grønnes arbeidsprogram 2017–2021*. Oslo: Miljøpartiet De Grønne.
NOU 2012:2 (2012). *Utenfor og innenfor – Norges avtaler med EU*. Oslo: Utenriksdepartementet.
NOU 2024:7 (2024). *Norge og EØS: Utvikling og erfaringer*. Oslo: Utenriksdepartementet.
Pelkmans, Jacques, and Phillipp Böhler (2013). *The EEA Review and Liechtenstein's Integration Strategy* (SSRN Scholarly Paper 2276902), available at https://papers.ssrn.com/abstract=2276902.
Powell, G. Bingham (2000). *Elections as Instruments of Democracy: Majoritarian and Proportional Visions*. New Haven: Yale University Press.
Princen, Sebastiaan, Frank Schimmelfennig, Ronja Sczepanski, Hubert Smekal, and Robert Zbiral (2024). 'Different yet the Same? Differentiated Integration and Flexibility in Implementation in the European Union', *West European Politics*, 47:3, 466–90.
Richards, K. Andrew R., and Michael A. Hemphill (2018). 'A Practical Guide to Collaborative Qualitative Data Analysis', *Journal of Teaching in Physical Education*, 37:2, 225–31.
Roos, Christof (2019). 'The (De-) Politicization of EU Freedom of Movement: Political Parties, Opportunities, and Policy Framing in Germany and the UK', *Comparative European Politics*, 17:5, 631–50.
Rye, Lise (2013). 'Crisis and Convergence: Norwegian Parliamentary Debate on the EU', in Lise Rye (ed.), *Distant Voices. Ideas of Democracy and the Eurozone Crisis*. Trondheim: Akademika Forlag, 161–86.
Rye, Lise (2019). *Norge i Europa*. Oslo: Fagbokforlaget.
Rye, Lise, and Kristine Graneng (2023). '«Et skjebnefellesskap» – Europapolitikken under Søreide', *Internasjonal Politikk*, 81:1, 38–48.
Sending, Ole Jacob, Guri Bang, Arne Melchior, Andrine Spets, Øyvind Svendsen, Ulf Sverdrup, and Indra Øverland (2021). *EUs Grønne Giv – implikasjoner for norsk europapolitikk*. NUPI, available at https://www.nupi.no/publikasjoner/cristin-pub/eus-groenne-giv-implikasjoner-for-norsk-europapolitikk (accessed 16 June 2023).
Senterpartiet (2005). '*Senterpartiets prinsipp- og handlingsprogram 2005 – 2009*',
Stie, Anne Elizabeth (2013). 'Arven etter Støre i europapolitikken', *Internasjonal Politikk*, 71:3, 396–406.
Stortinget (2001). *Stortinget - Møte tirsdag den 22. mai 2001 kl. 10 - Sak nr. 1*. Stortingets administrasjon, available at https://www.stortinget.no/no/Saker-og-publikasjoner/Publikasjoner/Referater/Stortinget/2000-2001/010522/1 (accessed 2 December 2023).
Stortinget (2002). *Stortinget - Møte torsdag den 14. november 2002 kl. 10 - Sak nr. 1*. Stortingets administrasjon, available at https://www.stortinget.no/no/Saker-og-publikasjoner/Publikasjoner/Referater/Stortinget/2002-2003/021114/1 (accessed 2 December 2023).
Stortinget (2007). *Stortinget - Møte Torsdag Den 8. November 2007 Kl. 10*. Stortingets administrasjon, available at https://www.stortinget.no/no/Saker-og-publikasjoner/Publikasjoner/Referater/Stortinget/2007-2008/071108/1 (accessed 2 December 2023).
Stortinget (2008). *Stortinget - Møte torsdag den 24. april 2008 kl. 10 - Sak nr. 1*. Stortingets administrasjon, available at https://www.stortinget.no/no/Saker-og-publikasjoner/Publikasjoner/Referater/Stortinget/2007-2008/080424/1 (accessed 2 December 2023).

Stortinget (2010). *Stortinget - Møte torsdag den 18. november 2010 kl. 10*. Stortingets administrasjon, available at https://www.stortinget.no/no/Saker-og-publikasjoner/Publikasjoner/Referater/Stortinget/2010-2011/101118/1 (accessed 30 January 2024).

Stortinget (2011). *Stortinget - Møte tirsdag den 24. mai 2011 kl. 10 - Sak nr. 1*. Stortingets administrasjon, available at https://www.stortinget.no/no/Saker-og-publikasjoner/Publikasjoner/Referater/Stortinget/2010-2011/110524/1 (accessed 2 December 2023).

Stortinget (2013). *Stortinget - Møte tirsdag den 9. april 2013 kl. 10 - Sak nr. 5*. Stortingets administrasjon, available at https://www.stortinget.no/no/Saker-og-publikasjoner/Publikasjoner/Referater/Stortinget/2012-2013/130409/5 (accessed 2 December 2023).

Stortinget (2018a). *Stortinget - Møte torsdag den 24. mai 2018*. Stortingets administrasjon, available at https://www.stortinget.no/no/Saker-og-publikasjoner/Publikasjoner/Referater/Stortinget/2017-2018/refs-201718-05-24?m=2 (accessed 30 January 2024).

Stortinget (2018b). *Stortinget - Møte tirsdag den 13. november 2018*. Stortingets administrasjon, available at https://www.stortinget.no/no/Saker-og-publikasjoner/Publikasjoner/Referater/Stortinget/2018-2019/refs-201819-11-13?m=1 (accessed 30 January 2024).

Stortinget (2019). *Stortinget - Møte tirsdag den 14. mai 2019*. Stortingets administrasjon, available at https://www.stortinget.no/no/Saker-og-publikasjoner/Publikasjoner/Referater/Stortinget/2018-2019/refs-201819-05-14?m=1 (accessed 30 January 2024).

Sverdrup, Ulf (2009). 'Hvorfor er europadebatt så vanskelig?', *Internasjonal Politikk*, 67:3, 426–40.

Søreide, Ine M. Eriksen (2019). *Redegjørelse av utenriksministeren om viktige EU- og EØS-saker, 9. mai 2019*. Stortingets administrasjon, available at https://www.stortinget.no/no/Saker-og-publikasjoner/Publikasjoner/Referater/Stortinget/2018-2019/refs-201819-05-09?m=1 (accessed 2 December 2023).

Telle, Stefan, Paolo Chiocchetti, and Brigid Laffan (2024). 'External Differentiated Integration: Between Stability and Change', *West European Politics*, https://doi.org/10.1080/01402382.2024.2444774.

Trondal, Jarle, and Anne Elizabeth Stie (2015). 'Blir handlingsrommet større med egen europaminister?', *Nytt Norsk Tidsskrift*, 32:2, 123–34.

Weaver, R. Kent (1986). 'The Politics of Blame Avoidance', *Journal of Public Policy*, 6:4, 371–98.

Young, Alasdair R. (2015). 'The European Policy Process in Comparative Perspective', in Helen Wallace, Mark A. Pollack, Christilla Roederer-Rynning, and Alasdair R. Young (eds.), *Policy-Making in the European Union*. Oxford: Oxford University Press, 46–69.

Zbiral, Robert, Sebastiaan Princen, and Hubert Smekal (2023). 'Differentiation through Flexibility in Implementation: Strategic and Substantive Uses of Discretion in EU Directives', *European Union Politics*, 24:1, 102–20.

Zhelyazkova, Asya (2024). 'Do EU Policies Constrain Government Autonomy? Insights from the Implementation of EU Migration Policies', *West European Politics*, 47:3, 595–618.

Zhelyazkova, Asya, Eva Thomann, Eva Ruffing, and Sebastiaan Princen (2024). 'Differentiated Policy Implementation in the European Union', *West European Politics*, 47:3, 439–65.