## Trading Partners or Trading Sovereignty? Finland, Norway and the EU

Christine Ingebritsen Susan Larson Department of Scandinavian University of Washington Division of Social and Cultural Studies University of California, Berkeley

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Introduction

while the Finns voted in favor.

Finland and Norway are small, export-dependent states with strong national identities and traditions, and corporatist political institutions. Finns and Norwegians live in the northern comer of Europe, relatively isolated from Continental politics, yet in the shadow of the Russian bear. As countries that have resisted domination by neighboring powers and have developed a strong sense of independence, the desire to join the European Union marks an historic change in Norwegian and Finnish politics.1 In the words of Ambassador Max Jacobson:

"For Finland, applying for EC [EU] membership marks a sharp break with the past. Traditionally, Finns have maintained their independence and national identity by exclusion. The creed of the Finnish national movement in the 19th century was formulated by one of its leaders in one terse sentence: We are no longer Swedes, we do not want to become Russians, so let us be Finns. From this double negative grew a nation with a distinct cultural identity..2 In the aftermath of the Cold War, Finland and Norway confronted new political choices.

Both governments were compelled to adjust to the disintegration of the Soviet empire, and the revival of integration in the European Union (EU). The EU is the largest recipient of Finnish and Norwegian exports, and changes in European institutions directly affect the health of the Finnish and Norwegian economies. In response to European integration, Finland and Norway followed the lead of Sweden and Austria and applied to join the European Union in the early 1990's. However, political elites in Finland were more successful than Norwegian political elites in convincing societal interests to approve the EU treaty. On October 16, 1994, 57% of Finns who voted in the national referendum agreed to join the EU. After a difficult campaign in Norway, the Social Democrats lost the battle over EU membership, and conceded victory to the anti-EU Center Party. On November 28, 1994, 52% of Norwegians voted "nei" to EU membership, and the government withdrew its application. Societal resistance to joining the EU was much stronger in Norway than in Finland. How can we explain Finnish accession and Norwegian resistance? This paper examines why the Norwegians voted against EU membership in the fall of 1994,

Prominent theories of international and domestic politics cannot account for why some Nordic states acquiesce to European Union membership, and others resist. In international relations theory, many scholars argue that small states are compelled to adapt to changes initiated by the strong: "Small states do not have the luxury of deciding whether or how fast to adjust to external change. They do not seek adjustment; it is thrust upon them. Norwegians, however, view European Union membership as an option - not an imperative. Other scholars argue that the political institutions of corporatist states facilitate a common pattern of "flexible adaptation" to externally driven changes 4; and thus fail to account for Norwegian rigidities. Another group of comparative politics scholars focus on the "exceptional" features of a single state's path dependent political and/or economic development - without reference to how changes in international politics affect political choices. To amend what we

see as a shortcoming of comparative work on the politics of Nordic accession, in this paper we compare and contrast the nature of each state's dependence on the international system and examine how the European Union debate played out differently in Finland and Norway. By attempting to account for where national interests come from and when they matter, we hope to contribute to a larger debate in the political science and anthropology literature on European integration. The first section of the paper explores the interests at stake and focuses on important differences between the political economies and security imperatives facing Norway and Finland. The second section discusses how questions of national identity and the capacity of political elites to capitalize on nationalist sentiment contributed to the outcome in each state.

## Norway and Finland: Security and Economic Dependence

Prior to 1989, Northern Europe was divided into two blocs: Eastern Scandinavia and Western Scandinavia. 5 As Johan Jorgen Hoist has argued, the Nordic states "balanced" their position between east and west by various types of affiliations with security institutions. Iceland permitted a NATO base on its territory and was thus deeply embedded in the western alliance system. Denmark and Norway joined NATO, yet did so with reservations restricting alliance maneuvers, and preventing NATO from maintaining forces on their territories in peacetime. Sweden is the only Nordic state that maintained a policy of neutrality and an independent military force. Finnish foreign and economic policy was dependent upon a post-war "mutual protection" agreement with the Soviet Union, requiring Finland to come to the defense of the USSR in the advent of war.

For the Nordic states, the end of the Cold War was a mixed blessing 6. The risk of a great power war in Europe virtually disappeared, yet the prospect of ethic conflict, environmental catastrophes, civil unrest, and proliferation became new concerns for Finnish and Norwegian military planners. In Eastern Scandinavia, the end of the Cold War created new political opportunities. Sweden and Finland were deeply affected by the end of the Cold War, and their policies of neutrality were no longer incompatible with European integration. As a consequence of changes in Finland's treaty with Russia, Finland could for the first time in the post-war period contemplate membership in the European Union - a group of predominantly NATO member states. For Finland, with a much longer border with Russia (1300 kilometers), a new role emerged with the end of the Cold War. to stabilize the situation in the East Baltic region. Finland is committed to encouraging the EU to assist in reviving the health of the Russian economy and in promoting democratic institutions. When Finland joined the EU on January 1, 1995, it accepted more European cooperation than Denmark by agreeing to all the terms outlined in the Maastricht treaty. Former defense minister Elisabeth Rehn put it this way: "We recognize that the Maastricht Treaty provides for the eventual framing of a common defense policy for the European Union, which might, in time, lead to a common defense. Finland accepts the treaty's provisions and is prepared to participate constructively in their implementation."7 Not only did security policy motivations differ as Finland and Norway contemplated EU membership, but so did the structural constraints on each state's economy.

As Lars Mjoset has argued, the "sectoral specifications" of dominant export markets create five different economic policy models in Northern Europe. 8 Norway's participation in the international energy market since 1975 has structured the options available to policy makers. The state's reliance on oil revenue has permitted borrowing abroad, a relatively favorable balance of trade payments, yet it has discouraged other forms of economic investment. 9 Finland, on the other hand, has entirely different structural constraints as an exporter of wood and paper products, metals, engineering, and electronics. Over the last twenty years, Norway's economy has become less diversified and more dependent on oil revenues, while Finland's economy has diversified into high-technology industries, away from dependence on forestry. In the 1960's, forestry products accounted for 75% of total exports. By the early 1990's forestry and industry each accounted for approximately 40% of the total exports. 10 Since the break-up of the Soviet Union, Finland and Norway share a similar dependence on European markets. 11

How did leading economic interests view European integration? Finland's most important economic interests (manufacturing and forestry) endorsed European integration as a way to revive the economy and expand market access. In Norway, on the other hand, the petroleum industry did not have as strong

an advocacy position: the oil and gas can be sold to the EU regardless of Norway's affiliation. Moreover, Norwegians wished to maintain national control over the industry. Instead, agriculture and the fishery industry, sectors of lesser importance to the economy, yet linked the historically agrarian heritage of each state, became a politically important obstacle to integration. Public empathy for the plight of the small farmer was high in both Finland and Norway?

Farmers in Finland and Norway were concerned about the consequences of liberalizing agricultural subsidies to comply with the European agricultural regime, the Common Agricultural Policy. 13 However, the capacity of the state to continue lavish supports to farmers differed in each country. Norway could rely on petroleum revenues to maintain such subsidies, whereas Finland had no such reserves. The breakup of the Soviet Union also ended Finland's long-term badder arrangement with its energy-rich neighbor. 14 No longer would the Finnish economy receive orders for Finnish goods in exchange for Soviet petroleum. The end of the Soviet empire corresponded with a severe economic crisis in Finland, with unemployment soaring to levels unheard of in Nordic labor markets - up to almost 20% of the labor force. This is in strong contrast to Norway where unemployment has been high in comparison to previous periods at approximately 6%, and the economy relies on revenue from petroleum exports. Finland viewed EU membership as a way to revive the domestic economy. According to Filip Hamro-Drotz, Senior Advisor at the Confederation of Finnish Industry and Employers, Finland's entry into the EU is critical for the future of the state, with membership being "completely indispensable" 15. The desire to resolve economic and security problems by joining the EU was a much more widely held view among the major political parties in Finland than in Norway.

In Norway, the Center Party was united against EU membership and (as in the 1972 campaign) represented EU membership as a fundamental threat to Norwegian national interests. The Center Party, traditionally representative of agrarian interests endorsed membership in Finland, although internally divided over the consequences of joining the EU on the agricultural sector. The Finnish parties with the largest representation in the national parliament, i.e., Center, Social Democrats, and the National Coalition, supported membership in the EU. When the Finnish parliament voted on EU membership in November, 152 members of 16

the 200 seat legislature supported the decision . Only the smaller parties, i.e... Christians, Ruralists, and the former Communists, opposed EU membership. In Norway, the parliament was divided between EU opponents, consisting of the Center, Christian People's Party, and the Socialist Left, and Eu supporters, the Social Democrats, Conservatives, and Progressives.

Thus, economic and security interests figured prominently in each state's debate over whether to join the European Union. For Norwegians, membership in NATO did not require them to join Europe in order to receive a security guarantee. In Finland, the unstable political situation to the east encouraged closer cooperation with other European states. To Norwegians, European integration represents a more competitive economic environment, and the state can continue to sell its oil and gas as a signatory of the European Economic Area (EEA) agreement. Economic motivations were underwhelming in the Norwegian case. While export-oriented firms were in favor of joining, protected sectors of the economy were strongly against EU membership. These sectoral interests mounted a grass-roots campaign to thwart the government's efforts to bring Norway into the EU. For Finns, on the other hand, European integration represents a way to revive the economy and reduce soaring levels of unemployment. Finland is marketing its economy as a "gateway to the Baltic states", hoping to encourage foreign direct investment from European states.

An interest-based account of Nordic accession ignores another critical dimension of Finnish and Norwegian differences: the relative success in mobilizing opposition to the EU by linking the debate to the identity of the nation. In Norway, the second largest political party (the Center Party) mobilized rural interests and urban sympathizers against the "union" of more powerful European states, and effectively presented EU membership as a threat to core Norwegian values. In Finland, no equivalent grass-roots social movement was strong enough to align with one of the major parties to divide the nation into two political camps. In the following section, we explore how the images of Finnishness and Norwegianness were important to the two referenda decisions.

Politics of Identity: The Experience of Periphery

Why were the politics of identity at the center of so much of Norwegian EU debate, while largely absent from the Finnish discussion? To an outsider, unfamiliar with Nordic history and internecine quarrels, the two countries with their small, seemingly homogeneous populations, and position on the periphery of Europe may seem to have much more in common, than would keep them apart. But how much do Finland and Norway share in societal and historical terms? How do they see themselves, as nations? 17

For the Norwegians, the framing of the debate around joining the EU had as much to do with deciding who they are as to where they belonged. This is not a new topic for Norwegians, and this latest round of discussion about identity neither began, nor will end, with the decision to remain outside of the EU. A spate of books and articles shows their seemingly endless interest in this subject 18. In fact, it can be argued that the Norwegians have been trying to find out what makes them unique since the dissolution of the union with Sweden in 1905. Preoccupation with identity is not exclusive to Norwegians, but this leads to a more interesting question is: Why are such questions of identity and autonomy so strong at this given time in Norway?

Part of what makes Norwegians Norwegian is the perception of a common "norsk hverdag" everyday life. Although this everyday life looks different in the north and south, and in rural and urban areas, there must have been enough shared elements that it was meaningful to enough inhabitants for it to be manipulated by political interest groups on both sides of the EU debate. Norwegian everyday life has at its center a sense of authenticity and homogeneity. It is, in a sense, an expression of the invention "the way things have always been". This quite despite the fact that many of the traditions held to be truly or specifically Norwegian (ekte norske/saernorske) are, in fact, the inventions and recreations of the 19th urban elite from Christiania and Bergen. To use Hylland Eriksen's expression:

"Det norske selvbild er ruralt, puritansk, egalitaert og alt i ait bondsk. Og man kunne tilfoye: Nordmenn er nationalistiske og lider avet langt fremskredent moralsk merverdskompleks..." 19 [The Norwegian self-image is rural, puritanical, egalitarian and, all in all, rustic. And one could add: Norwegians are nationalistic and suffer from a highly-developed moral superiority complex.]

This point is well taken, although, in terms of the EU debates, the top position in the "moral superiority" contest" would have to go to Sweden. One of the arguments made by Swedes for joining the EU, namely that Europe needs Sweden and, by extrapolation, has much to learn from the "Swedish model", was conspicuously absent from both the Norwegian and Finnish debates. "Norsk hverdag" can also be understood to symbolize the constituent parts of everyday life, as well as the whole. Some of these elements are: people who are white, speak Norwegian as their mother tongue, share a reverence for nature and outdoor life, preferably with outdoor occupations and who enjoy a high degree of egalitarian autonomy (the freedom to be yourself, just like every one else, as the old joke goes). Even those not especially or immediately concerned with the loss of a "traditional" Norwegian way of life opposed joining the EU, based on a fear of losing this autonomy - projecting their need for independence as individuals onto the state. The need for "Norwegians to make the important decisions about Norway" is a common theme in anti-EU pamphlets. But the issue is not whether this is part of an objective, quantifiable picture of Norway which holds true for all Norwegians. The relevant issue here is that this is part of the romanticized image of Norway which is considered "true" or "most typical" by a majority of Norwegians. 20 In reality, it falls quite neatly into what Hobsbawm and others have characterized as "invented traditions"? Were these romanticized images not held to be true by a large number of Norwegians, the political manipulation of such images and ideas would not only be pointless, it would not take place. Manipulation by political elites, such as political parties, extends, stretches, and convolutes ideas and traditions, creating space for further interpretation and application in the domain of popular opinion.

By joining the EU, Norway would enter into a union with others who did not speak Norwegian, were not necessarily interested in the uniqueness of the Norwegian countryside, nor go along with other elements of an extended "norsk hverdag". It does not matter that over half of the country's population currently lives in cities, or that perhaps 10% of Norway's citizens do not have Norwegian as their first language: it is a certainty that the rest of Europe will share even less in these interests. Immigration and internal migration to cities have already posed a threat to the "norsk hverdag" in the eyes of many Norwegians. However, any degree of difference which already exists would pale in contrast to the changes which would have been forced on Norway upon entering the EU.

In short, these types of societal interests and questions forced the pro-EU forces into a defensive position. Not only did they have to defend why Norway should belong to the European Union for a variety of economic, security, and social reasons, but they were also put in the unenviable position of giving almost quantifiable assurances that membership would not be a threat to core Norwegian values, in all their intangibility.

The EU debate in Finland was of quite a different nature. The debate was based largely on economic necessity and the desire to be a part of the "New Europe". By and large, the arguments against EU membership in Finland have been markedly factual, and devoid of much of the populist and nationalistic characteristics of the Norwegian debate. Typical arguments against joining have been expressed as standard of living, concerns about loss of tax money, the high cost of membership, the direction of welfare policy from a huge central bureaucracy, loss of neutrality, consequences of low proportional representation, etc. 22 Whether or not these concerns are paper tigers is a separate question, but they show a different framing of the question of membership. The Finns do not seem to be using the EU debate to ask questions about who they are. Those promoting EU membership were not forced to take part in debates on the nature of the Finnish character, or what being Finnish meant. There seems to be relatively little debate within the mainstream Finnish media, at least since World War II, about who is and is not a Finn and what makes up this category 23. Finland has been a multicultural and multilingual country for at least 500 years, and Finns have learned to make good use of what culture has had to offer. Perhaps because of this history, and the Finns own way of interpreting it, the current construction of Finnish identity seems to allow "European" as one of its constituent parts, whereas the Norwegians seem unsure about the contents, much less the plasticity, of their identity.

With a 1,300 kilometer border with Russia, Finland's biggest identity problem is perhaps being considered a part of Russia. This image of being part of the East, is viewed by Finns as being inefficient, nepotistic, Byzantine and, quite possibly, morally bankrupt. This is nothing new: Finns being taken for Russians irritated Finnish intellectuals (including the famous historian H.G. Porthan) already 150 years ago. This is in contrast to more positive views of Europe, especially Germany, France, and England. 24 According to a recent Finnish survey of attitudes about the components of Finnish identity, 11% of those questioned felt that "European-ness" or "Finland as a part of Europe" was an important component of Finnish identity up to the present, whereas a full 41% felt it was an element whose significance is growing (see appendix 1). And while 47% of the respondents felt that their country's special position between East and West was a component of national identity, this characteristic fell from seventh to thirteenth place. In the light of this type of change, it seems reasonable to question to what degree that element of self-perception was simply making the best of a bad situation. Thanks to the fall of the Soviet Union, and with it, the loss of the special position of the Finland/Soviet Union Friendship treaty and the subsequent instability of Russia, Finland can now say, "We are a part of Europe because we belong to Europe, not just as an auxiliary, broker state."

Why haven't the Finnish EU debates reflected the same concerns with loss of identity? Part of the answer certainly has to do with the general lack of debate, much less obsession, with Finnishness, but there are also more pragmatic reasons for the framing of the EU debates around practical issues. First, Finland's economic reality, with an unemployment rate hovering around 20% in the metropolitan areas, and a radical restructuring of the Finnish economy, unlike anything seen in the country since Russian war reparations brought about very rapid growth in heavy industry, meant that economic issues took a more important place in the debates. Norway, with its future looking secured through petroleum revenues, had the "luxury" of being able to discuss membership in more abstract terms.

Finland also has to contend with the shadow of Russia to a far greater extent than the Norwegians. Although independence is surely as much a trait for individual Finns as it is for Norwegians, there seems to be a sober realization of the limited degree which a small country with a large neighbor can assert its independence on the national and international level. This is not meant to paint all Finns as internationalists; certainly there are Finns who are suspicious of

outsiders, and those who were mistrustful were less likely to support EU membership. 25 Historian/Geographer W.R. Mead uses the old distinction between Kirina Suomi and Runo Suomi to describe regional tendencies towards being outward looking, versus turning inland and inward. The former "Book Finland" is used to describe the area including the industrialized and metropolitan areas of the south-western third of the country, traditionally well-educated, book-keeping, perhaps a bit bookish, and solidly oriented towards the west. The rural, forestry- oriented "Poetry Finland", so called because of its strong tradition of oral transmission, has been preoccupied with regional loyalties and interests. Although the names are a bit antiquated - literacy is universal in Finland - the old divisions remain. Negative discussion of the EU was strongest in the small, local papers of Runo Suomi, and, not surprisingly, the majority of localities voting no on the referendum lie to the north-east of that dividing line that divides the "two Finlands". These divisions correspond quite well with the division of yes and no votes: most of the no votes occurred in the larger, less industrialized area of Runo Suomi (see appendix 2).

While politicians in Finland initially remained tied to Finnish neutrality and their habitual caution, Finnish support of the EU remained in the lead from 1990, even as the politicians came around? Not to beg the "grass roots" question - write here about opposition - but even in the early stages, Finns seem to have viewed the question as one of "Yes or Nyet" long before their politicians caught on. This may also be a contributing factor to why Finns are opting for full membership, rather than the more "ala carte" approach of Denmark or England.

## Conclusion

As we have argued in this paper, the debate over each state's relationship to the EU took on a distinct character in Finland as compared to Norway. Norway's EU debate was more about what it meant to be Norwegian than it was about the pros and cons of EU membership. For a majority of Norwegians, membership in the EU represented an important way to revive the economy and to preserve the Finnish way of life. Economic imperatives encouraged Finns to align with Europe, while Norwegians sought to maintain the status quo: an open trading regime with the EU, yet no political subordination to the European Union's intrusive institutions. While Norwegians felt relatively secure as members of NATO. the instability in the former Soviet Union was an additional motivation for Finns to pursue foreign and security policy cooperation with the European core. Finns followed a strategy similar to Sweden by redefining national security policy to accommodate the conditions outlined in the Maastricht treaty. while the Norwegians identified with the Danish reservations outlined in the Edinburgh Protocol. Three important effects of Finland's entry into the European Union should be noted. First, the EU border now extends to Russia, and Finland, along with Sweden, will play an active role in promoting stability in Eastern Scandinavia. Second, the collapse of the Soviet Union has also altered Finland's trade balance, with Germany replacing its neighbor as Finland's largest trading partner. Finally, the Nordic social welfare model is becoming less distinct from the European model, as Finland is compelled to abide by the EU's more market-oriented policies. Esping-Andersen's "three worlds of welfare capitalism" are less distinct as a consequence of European integration, and Finns no longer view the Scandinavian "middle way" as a viable option to European integration. Only in oil-dependent Norway do we see societal interests thumbing their nose at Europe and having the luxury of hanging on to traditional notions of state sovereignty. Just how long Norwegians will stay out of the "union" is uncertain. The issue is likely to reappear in national politics prior to the 1997 parliamentary elections. In the meantime, integrationists, may be just as pleased that Norway remains an outsider, since the state does not share the visions of German and French federalists, but would be more likely to align with the British and resist supranationalism within the EU.

## Endnotes

1. In response to previous periods of European integration, Finland and Norway concluded a bilateral free trade agreement (the European Free Trade Area, or EFTA) with the European Union. Throughout the Cold War, Finnish foreign policy was defined by its relationship to its powerful neighbor, the Soviet Union. Norway,

on the other hand, sought to balance its relationship with NATO with a policy of reassurance to the East.

2 Max Jacobson, "Finland Seeks Membership in the European Community," Finnish Features, (Helsinki:1992),

3. Robert Keohane, After Hegemony, (Princeton: Princeton University Press, 1984), p. 179-

4. Peter J. Katzenstein, Small States In World Markets, (Ithaca: Comell University Press, 1985).

5. See Johan Jorgen Holst, "The Pattern of Nordic Security," Daedalus, Spring 1984, pp. 195-225; Ame Olav Brundtland, "The Nordic Balance: Relevant for Europe?" Zürich:1982; and Rolf Tamnes, The United States and the Cold War in the High North (UK: Dartmouth, 1991).

6.See Ole Waever, "Nordic Nostalgia: Northern Europe After the End of the Cold War," International Affairs V. 68, #1, January 1992; and Pertti Joenniemi, "Europe Changes: The Nordic System Remains?" Bulletin of Peace Proposals V. 21, #2, June 1990.

7. Elisabeth Rehn, "Finland in the New Europe," Speech to the Center for Strategic and International Studies, Washington, D.C., October 16, 1992.

8. Lars Mjoset, "Nordic Economic Policies in the 1970s and 1980s," International Organization V. 41, #3, Summer 1987, pp. 403-456.

9. See "It All Depends on Oil," Financial Times, June 26, 1992, Survey on Norway.

10. Juhani Kuusi, "Invest in Finland," (Technology Development Center, January 1993), p. 1.

11. Risto Madilia, "Forest Industry Still the Comerstone of the Finnish Economy," Finnish Features (Helsinki:1994), p. 6.

12. Interview with Henry Valen, November 30, 1994, Oslo.

13. Christine Ingebritsen, "Nordic Agricultural Reform: From National to Transnational Protectionism," paper presented at the annual meeting of the International Studies Association, Chicago, Illinois, February 25, 1995.

14. See Jan Otto Andersson, Pekka Kosonen, and Juhana Vartianen, "The Finnish Model of Economic and Social Policy: From Emulation to Crash," in The Nordic Models Between Internationalization and European Integration (forthcoming).

15. "Finnish Industry Fears Exclusion from European Union," Helsinki: Reuters, June 1, 1994.

16. Reuters, November 18, 1994.

17. "Nation" is understood here as distinct from "nation-state. This is an anthropological definition, defined as consisting of groups who imagine they share an ability to translate, understand, and create certain codes and symbols in common configurations, unique to that group and distinct from those of any other similar group. Some social scientists, such as Benedict Anderson (Imagined Communities, 1991) and Gellner (Nation and Nationality, 1974) define nation in a similar manner

18. See Den norske vaerematen (Klaussen, ed, 1984), Norsk utakt (Enzenberger, 1984); "Is Norway an European Country?", in Europa: Eine kulturelle Herausforderung für die Nordischen Länder (Tonnesson, 1992); and Typisk norsk (Edksen, 1993).

19. Hylland Edksen, 1993, pp. 84-85

20. For a complete discussion of what is and is not 'typically Norwegian", see Thomas Hylland Edksen's provocative essay collection of the same name (Typisk norsk: 1993).

21. See Hobsbawm, The Invention of Tradition, New York: Cambridge University Press, 1983, for a complete treatment of the topic.

22. See "Kampanjasisältöjen vaikutus kansanäänestyksessä" (in Pesonen, Suomen EU-kansanäänestys 1994: Raportti äänestäjien kannanotoista.) for more detailed discussion.

23. This is not to say that the topic has not been the subject of heated debate, even bloodshed, in earlier times. Finland has suffered from several internal conflicts, linguistic as well as political, but since the end of the Winter War (1940), the result has been consensus, rather than divisiness. See Allardt, 1987.

24. In fact, both times Finland managed to be free of the Russians, i.e. 1918 and 1941, she was influenced by Germany, first appointing a German regent, and second, by joining an alliance of necessity with Germany against the Russians. Both times, it took a Russian-educated general (and national hero), General C Mannerheim to redirect the country away from Germany and towards the constitutional democracies of France and England.

25. "Suomalisuus, kansainvälisyys ja EU-jäsenyys", Risto Sänkiaho and Erika Säynässalo, in Pesonen, 1994.

26. Ibid.

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Appendix 1, 2 and 3 on the next three pages