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Ethical Dilemmas in Refugee Integration:

Navigating Between Humanitarian Obligations and National Interests

A Comparative Analysis of Germany and Denmark

(2015-2020)

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Abstract

This thesis investigates how ethical principles shape refugee integration policies, with a focus on the tension between universal humanitarian obligations and national interests. Employing a comparative and thematic case study approach, this thesis analyses the asylum and integration policies of Denmark and Germany in response to the 2015 ''refugee crisis''. The study systematically examines secondary data, including national legislation, academic literature and key political speeches from each country to identify recurring themes and patterns that reflect the ethical dilemmas within each country's refugee policy framework. Drawing on the theoretical frameworks of Per Bauhn's ethical particularism, Catherine Dauvergne's theory of sovereignty and Ernesto Laclau's discourse theory, the study explores how states justify restrictive policies while maintaining claims to moral legitimacy.

The analysis reveals that both Denmark and Germany invoke ethical particularist reasoning to prioritise national interests - such as political stability, economic sustainability and social cohesion - over broader humanitarian commitments. Denmark follows a consistent trajectory of deterrence and limited inclusion, grounded in a long-standing political consensus. Germany initially embraced a universalist approach but shifted toward conditional protection in response to domestic political pressures and the rise of far-right movements.

This thesis further demonstrates how ethical concepts like solidarity and responsibility are redefined through political discourse to align with national agendas. Migration law emerges as a key domain for the reassertion of state sovereignty, allowing governments to manage refugee inclusion on their own terms. Ultimately, the study argues that states do not abandon ethical reasoning but adapt it through the lens of particularism, thereby limiting the scope of humanitarian protection. This research contributes to a deeper understanding of the ethical dilemmas at the heart of contemporary asylum governance and highlights the challenges of upholding universal ethical principles in an era of growing national prioritisation.

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Introduction

The global ‘’refugee crisis’’ is one of the most pressing humanitarian issues of our time. According to the United Nations High Commissioner for Refugees (UNHCR), at the end of 2023, more than one hundred million people were forcibly displaced worldwide, driven by war, persecution, and climate-related disasters (UNHCR, 2024c) making this phenomenon an issue extremely relevant within the international context.

The 2015 refugee migration wave to Europe, fuelled by conflicts in Syria, Afghanistan and beyond, had a profound impact in Europe, reshaping the continent’s asylum policies and awakening heated public debates. That year, over one million refugees and migrants arrived in Europe by sea, with nearly 4,000 losing their lives during the dangerous Mediterranean crossings (UNHCR, 2015). The sudden arrival of large numbers of refugees put immense pressure on European asylum systems, which deepened political divisions and highlighted the complexities of integration.

Several countries in Europe responded to the ‘’crisis’’ in different ways, highlighting this clear division of perspectives on humanitarian obligations. Germany, for instance, in late summer of 2015 (at the time under Chancellor Angela Merkel), embraced an open-door policy, welcoming over a million asylum seekers and reinforcing its humanitarian commitments emphasising its stance on the issue (Joppke, 2014). On the other hand, Hungary took a more defensive approach, building border walls and implementing strict asylum measures, prioritising its national interests claiming to have a national security concern, that, in the end, excelled over humanitarian concerns (Mudde, 2019). Denmark provides another example of this dilemma with its welfare reforms that were designed to discourage refugees coming to Denmark by limiting benefits in the integration. Such reforms highlight the friction between humanitarian obligations and national priorities when handling refugee integration. Although Danish authorities argue these policies ensure economic sustainability, organizations like the UNHCR have criticized them for undermining refugee rights (Bendixen, 2022). Across Europe, this balancing act between compassion and pragmatism continues to shape the refugee debate. These contrasting reactions to the ‘’refugee crisis’’ reflect a broader tension between the principles of international law - such as those outlined in the 1951 Refugee Convention - and national interests like economic stability, cultural identity and political cohesion.

The issue with integrating refugees is particularly pressing today, as the rise of populist movements across Europe has increasingly framed refugees as threats to national security and cultural identity. Over the past decade, several European countries have shifted toward right-wing politics, influencing their migration policies. Such as, Hungary's Fidesz party, under Viktor Orbán, that has pursued strict anti-immigration policies since its victory in 2010. Poland's Law and Justice (PiS) party, in power since 2015, has also taken a hardline stance on migration. In Italy, the Lega party, has advocated for tighter restrictions on asylum applications. Germany, while historically more open to refugees - especially during Chancellor Angela Merkel's 2015 decision to accept over a million asylum seekers - has also seen a significant rightward shift in recent years. The rise of the far-right Alternative for Germany (AfD) party, particularly following the 2015 ''refugee crisis'', has intensified anti-immigration rhetoric. These shifts reflect a broader European trend where nationalist and populist narratives increasingly shape refugee and asylum policies (Joppke, 2014; Wibisono, 2024).

Economic pressures also play a critical role. Countries like Italy, already struggling with high unemployment rates, argue that an influx of refugees puts additional strain on welfare systems and labour markets, which has resulted in more restrictive asylum policies and limited access to social services for refugees, reinforcing the narrative that national interests must come first. Security concerns add another layer of complexity. The fear of terrorism and crime has led to the securitization of migration policies. Denmark, for instance, has adopted a "paradigm shift", moving away from long-term refugee integration toward temporary protection measures (Wibisono, 2020). This shift stresses the obvious approach where humanitarian commitments take a backseat to national security priorities.

This thesis intends to explore this issue and understand the ethical dilemmas at the heart of refugee integration policies, focusing mainly on the tensions that rise when balancing humanitarian responsibilities, in this thesis framed as 'universal' and national interests, framed as 'particular'. More specifically, it aims to - Analyse the ethical principles (e.g., humanitarianism- universal , nationalism - particular) shaping refugee integration policies and to examine how political, economic and security concerns influence national approaches to refugee protection. And therefore, intends to compare the specific case studies of Denmark and Germany to illustrate how different governments

navigate these ethical tensions focusing mainly on how they addressed the 2015 ‘’refugee crisis’’ and its aftermath.

The main research question guiding this research being:

1. How do ethical principles help shape refugee integration policies?

   Nonetheless, to further examine this issue the research also makes use of the following secondary research questions;

2. How do Denmark and Germany reflect these ethical tensions in their refugee policies?

3. Why do states prioritise national interests, such as, political, economic, and security factors, over humanitarian obligations?

By addressing these questions, this research will offer a deeper understanding of the ethical and political challenges of refugee integration, shedding light on how countries navigate the delicate balance between upholding humanitarian commitments and safeguarding national priorities. The main question and the second sub question will be answered in the analysis section, as the analysis will provide clear examples that help understand the complexities of refugee integration policies, in a humanitarian (universal) setting in combination with national priorities and interests (particular). The third question will be answered in the discussion as it intends to further explore these complexities while reflecting on the reasons and meanings behind the national needs (particular) excelling over the humanitarian obligations (universal), sparking a discussion that enriches the findings described in the analysis section.

In order to do so, this paper will make use of a qualitative research approach and the case study method to generate in-depth understanding of this issue. This will be done to explore the complexities of each case and their policies focusing on their own national interests and obligations. The research will use document and thematic analysis to review and evaluate data, such as national legislation, official governmental reports and documents, and scholarly literature. The study makes use of a deductive approach, applying the theories of Per Bauhn, Ernesto Laclau, and Catherine Dauvergne to examine the issue. A comparative analysis will be employed in order to compare the chosen case studies, highlighting similarities and differences to ensure a thorough understanding of the issue and a proper assessment of how ethical dilemmas in refugee integration are

navigated in different national contexts. This approach will allow for a critical evaluation of the extent to which humanitarian obligations (universal) and national interests (particular) shape policies and influence long-term integration outcomes.

The study is organised as follows: Section one will include the study background, research questions and objectives, and a brief study context. Section two will present a literature review and theoretical considerations, while section three will shed light on the methodological considerations. Section four will cover a summary of key findings, analysis and discussion. Finally, section five will present the study conclusion.

Literature Review

In order to effectively look at the ethical challenges that might arise in refugee integration, it is first necessary to look at the legal and conceptual foundations that determine how refugees are understood in the international system. The following section details the international frameworks of the rights of refugees and the duties of states. These include the 1951 Refugee Convention and the 1967 Protocol, which were developed by the United Nations High Commissioner for Refugees (UNHCR). These are not mere technical guidelines but are based on specific moral principles, namely that of protection, of respect, and non-refoulement. These guidelines constitute the universal normative principles and legal obligations upon which the ethical framework of this thesis is based.

Nevertheless, with increasing refugee inflows and the context of political situations changing, there is a review of these international commitments. The second aspect explored in this literature review is how national security concerns and rising nationalist movements are changing refugee protection. Betts (2011) and Wibisono (2024) both discuss how the intersection of international human rights law with state sovereignty and national security has created deep tensions in contemporary migration governance. Although states remain legally bound to protect refugees, the growing influence of nationalist and populist movements has significantly reshaped policy responses.

These shifts in public discourse and policy are further reinforced by the role of media in shaping societal attitudes toward refugees. The third segment of the literature discusses the role that media plays in shaping refugee integration attitudes. McCann, Sienkiewicz and Zard (2023) conducted a comparative study of how the media portrayed two major refugee cases in Europe, which include the 2015 arrival of Syrian, Afghan and Iraqi refugees and the 2022 refugees from Ukraine. Their findings demonstrate that public approval, which is greatly influenced by media constructs, can help or hinder the implementation of moral refugee integration policies.

By reviewing both legal texts and academic discussions, this section aims to clarify the values and obligations that guide refugee protection, while also pointing to some of the gaps in the existing literature - especially when it comes to how countries

like Denmark and Germany justify their policies ethically. This thesis builds on that by asking how these tensions play out in national integration policies and what they reveal about the broader direction of refugee governance in European contexts. These debates intend to help explain the growing tension between universal obligations and particular interests, which lies at the heart of this research.

International Legal Framework and Concepts

To effectively discuss refugee integration, it is essential to first understand the international legal frameworks that shape the policies governing refugees as they seek asylum. This includes exploring the definitions of key terms such as 'refugee' and 'asylum seeker', as these are central to determining the rights and protections afforded to individuals within international law. This first section of the literature review aims to provide a clear overview of these foundational definitions and legal structures, offering a better understanding of how they influence the policies and practices surrounding refugee integration. This will be done by reviewing official documents and the official definitions provided by the UNHCR official website.

The United Nations Higher Commissioner for Refugees, from now on referred to as UNHCR, defines a refugee as s*omeone who was forced to flee their own country and seek safety in another country*. They could have been victims of human right violations, been injured during the process of fleeing or have lost family members and friends due to the conflict. They are unable to return to their countries due to fear of prosecution as a result of who they are, what they believe in or say, or due to a specific armed conflict, violence, or serious public disorder (UNHCR, 2024a).

It is important to also clarify the definition of an asylum seeker. An asylum seeker is an individual who seeks international protection but has not yet received a formal decision regarding their request for refugee or complementary protection status. This includes those who have already submitted an application, as well as those who intend to do so upon arrival in a host country. When people flee their home countries to escape danger, they must typically apply for refugee status in the country of refuge. While awaiting a decision on their claim, they are referred to as asylum seekers and are entitled to certain protections under international law. Although not all asylum seekers are ultimately granted refugee status, all individuals recognized as refugees must have first applied for asylum. According to the official numbers provided by the UNHCR website

there were eight million asylum seekers globally by the end of June 2024 (UNHCR, 2024b).

According to the most recent numbers provided by UNHCR, at the end of June 2024, 122.6 million people worldwide were forcibly displaced as a result of persecution, conflict, violence, human rights violations or events seriously disturbing public order. It is estimated that 43.7 million of them are refugees, accounting for 32 million refugees and 5.8 million other people in need of international protection under UNHCR's mandate, and 6 million Palestine refugees under UNRWA's mandate (UNHCR, 2024c).

The 1951 Convention relating to the Status of Refugees established the core legal framework for the protection of refugees, defining the obligations of host countries and the rights of those seeking asylum. It was a landmark development in international law, as it introduced, for the first time, a general definition of who qualifies as a refugee (UNHCR, 2005, p. 26). The Convention outlines a wide range of rights afforded to refugees, including access to documentation, employment, education, legal systems, freedom of movement and the practice of religion. Its provisions are designed to uphold the dignity and fundamental rights of refugees, regardless of their host country or specific circumstances. Initially, the Convention applied primarily to post–World War II refugees in Europe. However, the 1967 Protocol was later introduced to respond to the evolving nature of displacement. This Protocol removed the original geographic and temporal restrictions, thereby expanding the Convention’s applicability to refugee situations worldwide and ensuring a more comprehensive and inclusive protection frame (UNHCR, 2006, p. 36).

The 1951 Refugee Convention and its 1967 Protocol outline fundamental principles for refugee protection, including:

1. Non-refoulement: Refugees should not be returned to a country where their life or freedom is threatened.

2. Expulsion: Refugees may only be expelled from a country of asylum if their presence poses a serious threat to national security or public order, subject to certain guarantees.

3. Non-discrimination: Protection should be provided to refugees without discrimination based on race, religion, nationality, or gender.

4. Legal status: Refugees should not be penalized for illegal entry or presence in a country if they promptly inform authorities.

5. Compliance: Refugees are required to adhere to the laws and regulations of the country of asylum.

6. Humanitarian activity: Refugee protection should not create tensions between countries.

7. Cooperation: Governments should collaborate with UNHCR to protect refugees.

8. International cooperation: Solving refugee problems requires international cooperation.

(UNHCR, 2006, p.36)

The legal frameworks provided by the Convention and the Protocol represent a commitment by the international community to guarantee the rights of the individuals that are fleeing persecution, conflict, or violence.

Refugee Protection and National Security

The intersection of international human rights law, refugee protection, nationalism and security concerns present a complex and evolving challenge in contemporary migration governance. The legal framework established by the 1951 Refugee Convention and its 1967 Protocol has shaped state obligations toward refugees, emphasising fundamental principles such as non-refoulement and shared responsibility (Betts, 2011; Wibisono, 2024). However, despite these legal commitments, states increasingly struggle to balance their humanitarian obligations with national security interests, often resulting in restrictive migration policies that weaken refugee protections (Betts & Loescher, 2011; Wibisono, 2024).

The growing influence of nationalism and populist movements has significantly shaped state responses to refugee protection. According to Betts (2011), nationalist rhetoric frames refugees as threats to national security and cultural identity, fostering a political climate that justifies exclusionary policies. Wibisono (2024) similarly argues that the securitization of migration - particularly concerning Muslim refugees - has intensified, with states prioritising border control over humanitarian commitments. This

trend aligns with a broader shift towards deterrence-based policies, including offshore detention, border externalization, and restrictive asylum procedures, which weaken international cooperation and burden-sharing mechanisms (Betts & Loescher, 2011; Wibisono, 2024).

A key ethical dilemma in refugee integration arises from the tension between national sovereignty and the collective responsibility to uphold human rights (Wibisono, 2024). While the principle of non-refoulement remains a cornerstone of refugee protection, political and economic pressures have led states to adopt increasingly rigid migration policies, often at the expense of refugee rights (Betts & Loescher, 2011). Wibisono (2024) highlights how populist leaders capitalize on public fears and xenophobia to justify restrictive policies, further eroding international solidarity. The failure to adequately integrate refugees exacerbates social fragmentation and places vulnerable populations at even greater risk, raising concerns about the long-term consequences of such exclusionary approaches.

Ultimately, this literature highlights the urgent need for a more cooperative and humane approach to refugee protection - one that balances security concerns with fundamental human rights principles (Betts & Loescher, 2011; Wibisono, 2024). Without renewed commitment to international collaboration, the increasing securitization of migration risks undermining the very legal frameworks designed to protect displaced populations, challenging the ethical foundations of refugee governance in the process.

To conclude, while the work of Betts and Wibisono provides important insight into the rise of securitization and nationalist resentment toward refugee protection, some basic gaps remain. Much of the literature focuses on broad political trends and international law but gives less attention to precisely how these matters develop within specific national settings. There is little exploration of how Denmark and Germany ethically justify restrictive policies or balance between humanitarian commitments and national priorities. In addition, while both authors refer to populism and public fear, they do not fully address how political leaders use ethical argumentation to shape public discourse or policy. The ethical challenges of refugee integration in the long term, and specifically the ethical dilemmas that arise after arrival, are also underexplored in this literature. This thesis addresses these gaps by analysing how ethical concerns are conceptualized and implemented in refugee integration policies in two contrasting national contexts.

Media Narratives in Refugee Integration

Public images of refugees are a crucial aspect in influencing public opinion and, ultimately, political decision-making in receiving communities. McCann, Sienkiewicz, and Zard (2023) offer comparative narrations of media framing of two huge refugee flows into Europe: the 2015 influx of Syrian, Afghan and Iraqi refugees and the 2022 displacement of Ukrainian nationals. Relying on European news media's thematic and sentiment analysis, scholars demonstrate how the media is an effective discursive force for shaping moral hierarchies of refugees.

The study finds that coverage in the media in 2015 framed most Middle Eastern and African refugees mostly as security dangers and cultural others, resorting to crime and religious extremism narrative and economic burden. In contrast, the 2022 representation of Ukrainian refugees was much more sympathetic and humane, emphasising family dynamics, European values, and the unjust cruelty of war. These competing representational forms, McCann et al. argue, reveal the racialized and geopolitical facets of ‘’deservingness’’ in European asylum discourse. The Ukrainian case, in particular, demonstrates the profound influence of proximity to whiteness and cultural similarity on the moral legitimacy accorded to refugees by political elites and the public.

Above all, the authors assert that media narratives not only reflect public opinion but actually shape the conditions under which humanitarian duty is extended or withheld. Media discourse thus appears as a principal vehicle through which moral values like solidarity, inclusion and universal human rights are translated in national political cultures. The institutionalization of differential compassion - extended to some and withheld from others - undermines the universality of refugee protection enshrined in international law (McCann et al., 2023).

While the research is robust in its evidence of how media influences public perception of refugees, it does not necessarily look at how these stories are translated into concrete national policies. The relationship between discursive framing and institutional action is undertheorized and so it remains to be seen how governments translate these moral hierarchies into law and policy. This thesis builds on the work of McCann et al. by examining how these narratives influenced refugee integration policies in Denmark and Germany, and how they intersect with national political identities and ethical

justifications for exclusion or conditional inclusion. In so doing, the research assists in filling an essential gap in the literature by bringing together the discursive and institutional aspects of ethical issues in refugee management.

Theory

In order to explore this issue at its core, it is first necessary to assess the theoretical foundations serving as basis for the analysis of this thesis - the ethical dilemmas that arise in refugee integration policies, particularly, the ones that evolved over time in the aftermath of the 2015 ‘’refugee crisis’’ within two specific contexts, Denmark and Germany. For this purpose, this theoretical framework draws on three interrelated perspectives: Firstly, the moral conflict between universal and particular duties, outlined by Per Bauhn; Secondly, the political logic of universalism and identity, explored by Ernesto Laclau; And thirdly, the assertion of sovereignty through migration control, as analysed by Catherine Dauvergne. Together, these theories offer a multi-layered lens through which to interpret and critically evaluate the ethical tensions present in refugee integration policy, particularly as they emerge in shifts in legislative changes, public discourse and integration measures implemented during and in the aftermath of the 2015 ‘’Refugee Crisis’’ in Denmark and Germany.

Ethical Universalism vs. Ethical Particularism

Per Bauhn provides an ethical framework that clarifies the normative conflict at the heart of refugee integration. According to Bauhn, refugee protection is an inherently moral issue because it involves determining to whom duties are owed: Either all human beings equally (universalism), or one’s own fellow citizens first (particularism). He argues that ‘’human rights would seem to imply a moral cosmopolitanism’’, in which no individual’s suffering is deemed less relevant because of national boundaries (Bauhn, 2019, p.145). This view lays strongly on the assumption that moral obligations are not geographically restricted, that they expand beyond borders.

However, Bauhn also acknowledges the counterbalancing reality that states do have particular duties to their own citizens and therefore need to navigate this complexity and balance both sides of these obligations. And so, to mediate this ethical tension, Bauhn offers two guiding principles: - The comparable Cost Principle – which implies a state should admit refugees, when the cost of not doing so, is significantly greater for the refugees than the cost incurred by the host society in providing protection, in other words, the state should protect refugees when the harm to refugees outweighs the cost to the host society; And – The Fair Share Principle – that posits that states are morally obligated to contribute to refugee protection in proportion to their capacity and resources, but are not

expected to bear a disproportionate burden (Bauhn, 2019, p.149). These principles can be especially useful when analysing the divergence in the integration approaches between the two case studies, Denmark and Germany.

To conclude, Per Bauhn's theory provides a basis for evaluating how states ethically justify their policies and whether their actions reflect a balanced, proportionate response to humanitarian obligations. It provides a normative ethical framework to understand the conflict between refugee rights and state obligations, it argues that there is a moral conflict between the universalist duty to protect all human beings (e.g. refugees) and the particularist duty of states to protect their own citizens and it poses a resolution through two principles, the comparable cost principle and the fair share principle. This theory is of extreme relevance since it allows us to evaluate integration policies ethically, not simply by their outcomes but also by their alignment with shared responsibilities and fairness.

Universalism, Particularism and Political

While Bauhn focuses on ethical principles, Ernesto Laclau interrogates the construction of those principles within political discourse. His theory of universality problematizes the assumption that values like human rights or humanitarianism are neutral or apolitical. According to Laclau, universalism is always articulated through particular political projects. In his own words, *''The universal is no more than a particular that has become dominant''* (Laclau, 1992, p.87).

In Laclau's view, universal principles such as refugee rights are never simply applied - they are shaped and defined by political actors. Laclau's perspective draws attention to the power structures and hegemonic struggles that influence which ethical principles are prioritised, who is included under the banner of the universal, and who is excluded. Rather than assuming a fixed or universally agreed-upon understanding of humanitarian responsibility, his approach emphasises that these values are always embedded within and altered through national discourses and ideological frameworks.

Furthermore, Laclau's notion of hegemonic articulation enables a critical reading of these public discourses, it reveals how states may uphold universal principles rhetorically while simultaneously redefining the boundaries of inclusion in ways that better align with their national interests. This notion is essential when analysing policy

shifts and public narratives (such as political or media discourse) that intend to present refugee integration either as a moral imperative or as a security and cultural threat.

In conclusion, Laclau's theory sheds light on the dynamic and strategic nature of universalist claims in refugee policy. It helps to understand how political actors frame integration debates in ways that uphold national coherence while responding to international expectations. For this thesis, his insights are essential for understanding how ethical values are mobilized in national discourse, often serving as tools for legitimising exclusionary practices under the excuse of shared principles.

Sovereignty and Migration Control

This theory, developed by Catherine Dauvergne contributes with a more structural dimension to this theoretical framework. She emphasises that refugee and migration law functions as an assertion of state sovereignty in an increasingly interconnected world. She argues that migration control has become '*'the last bastion of sovereignty''* (Dauvergne, 2004, p.589), because states have ceded authority in many other domains such as, trade, finance and international regulation.

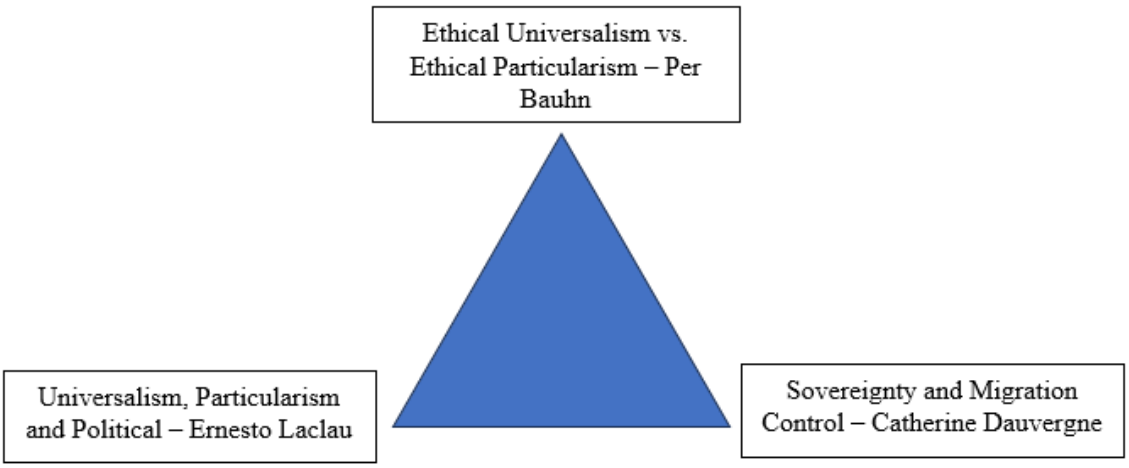
According to this theory, migration law, is not just a legal or administrative mechanism – it is a site of identity construction and boundary maintenance. Dauvergne argues that decisions about who can enter, who qualifies as family and who is considered economically valuable are tied to national self-perception. Humanitarian measures, such as admitting refugees, are often framed not just as obligations but also as acts of benevolence that reinforce national virtue (Dauvergne, 2004, p.590). This perspective is vital for understanding why refugee protection policies often fall short of international expectations.

Furthermore, Dauvergne's argument that international human rights law has made ''*few inroads in questions of migration*'' (Dauvergne, 2004, p. 588) shows that there is often a gap between international legal standards and what states actually do. Even democratic countries that are committed to the rule of law can limit refugee rights without technically breaking international rules. This is because migration control remains largely under national authority, and international law offers few tools to enforce humanitarian obligations. As a result, states can focus on national interests - such as security or social cohesion - while still appearing to respect international norms.

In conclusion, Dauvergne's perspective draws attention to the deeper political and institutional structures that shape refugee policy beyond moral reasoning or rhetorical commitment. Her work explains how sovereignty operates not simply through border enforcement, but through the symbolic and legal frameworks that define national identity. For this thesis, her insights provide an essential lens for understanding how Denmark and Germany strategically navigate the tension between appearing compliant with international norms and asserting control over refugee inclusion.

Conclusion

Together, these three theoretical approaches offer an insightful base for examining refugee integration policies and its ethical dilemmas. Per Bauhn offers a normative foundation that helps evaluate the proportionality and moral justifiability of refugee policies. Ernesto Laclau problematizes the framing of universal values, revealing how they are politically constructed and instrumentalized. Catherine Dauvergne situates these debates within a broader structural logic, showing how migration control operates as a domain of sovereign self-assertion.



By integrating these theories, this thesis aims not only to assess whether Germany and Denmark's integration policies align with ethical principles, but also to understand how those principles are selectively framed, implemented, and constrained. This framework enables a critical analysis of both policy changes and internal public discourses, capturing the tensions that arise when universal humanitarian obligations encounter particular state priorities in practice.

Methodology

Philosophy of Science

The following section intends to outline the philosophical principles that strengthen the research methodology employed in this study. Engaging with the philosophy of science is essential as it allows for a clearer understanding of the underlying assumptions about knowledge, reality, and the research process itself. By outlining the ontological and epistemological stances adopted in this research, this section aims to justify the methodological choices made when exploring the ethical dilemmas in refugee integration policies in Denmark and Germany. In other words, understanding the philosophy of science is crucial in qualitative research as it helps position the study within broader theoretical frameworks, guiding how data is interpreted and analysed.

Ontology refers to the nature of reality that the researcher seeks to understand (Bryman, 2016). This study adopts a constructivist ontological stance, acknowledging that refugee integration policies are shaped by various political, economic, and cultural contexts, rather than being fixed or objective realities. The research seeks to understand how different ethical dilemmas emerge in refugee integration policies across Denmark and Germany, focusing on how national priorities, political discourse, and institutional frameworks influence these policies.

Epistemology, on the other hand, concerns how knowledge about this reality is acquired (Bryman, 2016). This study adopts an interpretive epistemology, emphasising that knowledge is gained through interpreting policies, discourses, and the ethical tensions they generate. The research assumes that meaning is constructed through understanding and interpretation rather than being discovered as an objective truth.

This philosophical foundation enforces the study's qualitative design and case study approach, enabling an in-depth exploration of the ethical considerations that are at play and help shape refugee integration policies in Denmark and Germany.

Research Design

This study employs a qualitative research approach to conduct a comparative analysis of the ethical dilemmas in refugee integration policies in Denmark and Germany. Through an in-depth examination of the two case studies, the research aims to explore how each

country navigated the tensions between humanitarian obligations and national interests, particularly in the context of the 2015 ‘’Refugee Crisis’’ and its aftermath.

There are several ways of conducting research - such as, historical, experimental, archival, and case study (Robert Yin, 2003, p. 83). In this research paper, the case study method is employed as the principal methodological approach. A case study is an empirical inquiry that investigates a contemporary phenomenon within its real-life context, particularly when the boundaries between the phenomenon and context are not clearly defined (Robert Yin, 2003). This method is particularly suited for the study, as it allows for a detailed contextual analysis of policy frameworks, political discourse and integration measures within each country. Additionally, this study will employ document analysis and thematic analysis to examine relevant policy documents, governmental reports, and scholarly literature from both Denmark and Germany. Thematic analysis will then be used to identify and interpret patterns and themes within these materials, uncovering the underlying ethical dilemmas and policy reasonings driving refugee integration strategies in both countries.

Given the complexity of refugee governance and the ethical considerations involved, this methodological approach ensures a nuanced understanding of the socio-political landscape influencing refugee integration. Furthermore, the use of comparative analysis, which is described further down, adds depth to the research by examining the same phenomenon (refugee integration) in two different contexts, providing a richer understanding of the factors shaping these policies and the ethical tensions they produce.

Case study Selection Criteria

The selection of Denmark and Germany as case studies is based on their distinct approaches to refugee integration, which offers valuable insights for comparative analysis. These countries demonstrate different ethical dilemmas in balancing humanitarian responsibilities with national interests.

Denmark represents a restrictive model of refugee integration, characterized by policies that prioritise national identity preservation and economic sustainability over long-term inclusion. Measures such as welfare benefit cuts, the ‘’Jewerly law’’ and an emphasis on temporary protection reflect a growing reluctance to provide permanent resettlement. Ethical tensions in the Danish approach stem from the struggle between

maintaining a national welfare system and fulfilling international humanitarian obligations.

Germany, in contrast, has pursued a more-or-less balancing approach, particularly evident in its 2015 open-door policy, which welcomed large numbers of refugees while implementing structured integration programs. These initiatives, including language courses and employment pathways, highlight Germany's commitment to both humanitarian principles and pragmatic concerns such as labour market demands. However, this approach raised some challenges, including nationalist backlash and political polarization, which have tested the sustainability of its inclusive policies and have influenced refugee policies.

By comparing these two contrasting responses, this research provides a comprehensive analysis of how different national contexts shape the ethical considerations triggering refugee integration policies. The case studies highlight critical tensions, including welfare preservation versus humanitarian responsibility and social cohesion versus inclusion, demonstrating how national priorities influence refugee policies.

Comparative Analysis

The comparative analysis employed in this research design enables a focused comparison of the two countries, highlighting the differences and similarities in their approaches to refugee integration. By systematically analysing policy frameworks and integration measures of Denmark and Germany, this study will examine how each country frames and justifies its ethical decisions in refugee policy. The comparative analysis will not only reveal the distinct ethical dilemmas faced by each country but might also help to identify broader trends and contradictions within European refugee policies.

This approach is particularly useful for understanding how both Denmark and Germany responded to the 2015 ''refugee crisis'' and how their strategies have evolved in the following years. It allows a deeper examination of how historical, political and societal factors might have shaped their responses to a shared humanitarian challenge and how these responses might reflect different interpretations of responsibility, solidarity, and national interest, etc; By placing the two cases side by side, the analysis intends to

draw attention to the complex ethical tensions that continue to influence refugee integration across European contexts.

To conclude, the use of comparative analysis adds depth to the research by offering a structured way to explore national differences and shared challenges, providing valuable insights into the ethical dimensions of refugee integration in the context of the 2015 ‘’crisis’’ and its aftermath.

Sources of Data

There are two main sources of data, primary and secondary. Primary source of data is when the researcher conducted the data himself, whereas secondary data is generated by using data that has previously been conducted (Bryman, 2016). This study relies exclusively on secondary data, ensuring a comprehensive and systematic examination of refugee integration policies.

The sources of data include policy documents such as national asylum and integration laws, EU directives, and governmental policy statements that outline each country’s approach to refugee integration. Academic literature, including peer-reviewed articles, reports and books are examined to analyse refugee policies, ethical considerations and integration outcomes in each country. In addition, one political speech from each case study is included, since these serve as key discursive sources that reflect how political leaders framed refugee integration during critical moments. It is important to mention that where relevant documents, such as legislation and political speeches, were only available in Danish or German, I conducted my own translations to ensure a consistent and contextually grounded interpretation of important legal and discursive content. Furthermore, these sources were systematically reviewed to identify recurring themes and patterns that define the ethical dilemmas present in each country’s refugee policy approach. The triangulation of these multiple data sources strengthens the reliability of the findings, allowing for a comprehensive assessment of the moral and political challenges in refugee integration.

Data Analysis Approach

There are various means of analysing data in any academic research, this includes, discourse analysis, thematic analysis, content analysis, etc., (Bryman, 2016). For this

research paper, a combination of document analysis and thematic analysis (TA) will be employed to explore the ethical dilemmas in refugee integration policies within the selected case studies - Denmark and Germany.

Document analysis is a systematic method for reviewing and evaluating documents to gain insights, generate understanding and develop empirical knowledge (Corbin & Strauss, 2008). This approach is particularly suited to this study as it allows for the examination of policy documents, governmental reports, and scholarly literature, which are essential sources of data for understanding the ethical considerations and policy choices in the refugee integration process. By analysing these documents, I aim to identify key issues, such as the balance between humanitarian obligations and national interests (universal vs. particular) and how the discourse is constructed within asylum law and integration strategies.

Following the document analysis, thematic analysis (TA) will be used to identify, analyse and report recurring themes within the data. Thematic analysis is a flexible qualitative method that allows for the systematic coding of data to uncover patterns and underlying meanings (Braun & Clarke, 2006). The process begins with familiarization, where the researcher immerses themselves in the data by thoroughly reading and re-reading the documents to understand their depth. The next step involves generating initial codes or subthemes, where significant features across the data are highlighted. These subthemes are then organised into potential main themes, such as *Protection, Integration, Repatriation.* These themes are then reviewed to ensure they accurately reflect the data, and the final step involves producing a detailed report that connects the identified themes to a comprehensive understanding of the ethical dilemmas at play.

Importantly, this thesis employs a diachronic perspective within the thematic analysis in order to trace how central themes and policy discourses have evolved over time. By examining the shifts in discourse and policy framing across the selected period of 2015-2020, this approach captures the temporal dynamics of ethical and political considerations in refugee integration within the selected case studies.

Additionally, this thesis makes use of an ‘adaptive’ thematic analysis, incorporating pre-existing concepts that emerged from earlier research and from the theories. These concepts will re-emerge in the analysis, helping the development of

themes and subthemes, connecting the research and guiding the interpretation of ethical and policy related dimensions within the data analysed. To deepen the analysis, a mixed coding approach is adopted, combining both descriptive and interpretative methods. Descriptive coding provides concise labels to summarise surface-level meanings, while interpretative coding delves into the deeper, latent meanings, assumptions and values within the data (Braun & Clarke, 2012). This coding process will be conducted manually, allowing for a hands-on, immersive engagement with the data, ensuring a stronger connection with the materials and enabling a more nuanced interpretation.

As mentioned before, the study will integrate comparative analysis to enhance the findings by systematically comparing the internal dilemmas, policy frameworks and approaches to refugee integration in Denmark and Germany. This approach allows for a comprehensive exploration of how these countries balance humanitarian responsibilities with national priorities, especially in light of the 2015 ‘’refugee crisis’’ and its aftermath. By examining these policies side by side, the research will also explore the influence of historical, cultural and political contexts on national approaches to refugee integration.

The combination of document analysis, thematic analysis and comparative analysis within a diachronic perspective ensures that the findings are grounded in a comprehensive understanding of the ethical dilemmas surrounding refugee integration policies. This approach provides a detailed examination of how each country navigates these complex challenges and the broader implications for policy and political discourse.

The themes and subthemes generated through evaluation and re-evaluation of data can be found at the end of each case study analysis.

Use of theory

This study makes use of a deductive research approach, applying three complementary theoretical perspectives to support the analysis of ethical dilemmas in refugee integration policies in Denmark and Germany. Each of these theories offers a unique lens through which to examine the data, frame the comparisons and evaluate the ethical implications of these policies.

First, we have Per Bauhn’s ethical framework, which serves as a moral compass for assessing the legitimacy of the integration efforts. He introduces principles like the Comparable Cost and Fair Share arguments, which help us determine whether Denmark

and Germany are effectively balancing their humanitarian obligations with their national interests. This framework is crucial for analysing the policies rolled out during and after the 2015 ‘’refugee crisis’’, allowing us to scrutinize whether the measures taken are morally acceptable.

Next, we delve into Ernesto Laclau’s theories of universalism and hegemonic articulation for a critical discourse analysis. This perspective helps us unpack how political leaders in both countries frame and articulate universal ethical claims - such as humanitarianism and solidarity - within the context of their national narratives. By applying Laclau's theories, we can better understand how certain discourses dominate the public conversation, how exclusions are rationalized and how political interests influence the language surrounding ethics and identity.

Finally, Catherine Dauvergne’s theory on migration control and sovereignty offers insights into the structural dynamics of refugee policies. Her work sheds light on how the legal frameworks and institutional practices in Denmark and Germany reflect broader objectives aimed at asserting state sovereignty and shaping national identity. This perspective helps us analyse how government structures and political priorities either facilitate or hinder ethical commitments, especially when universal rights clash with domestic pressures.

By intertwining these theories together, the study creates a rich analytical framework: Bauhn establishes the ethical standards, Laclau illuminates the construction and politicisation of ethical language and Dauvergne reveals the legal and institutional landscapes that shape ethical actions. Each theory directly relates to the key research questions and supports a qualitative, comparative and interpretive approach, allowing for a nuanced understanding of the issues at hand.

Limitations of the Study

This research acknowledges several limitations that may impact its findings. Constraints in data availability may affect access to certain policy documents and reports, while media sources and political rhetoric may introduce biases in the representation of refugee policies and public perceptions. Additionally, policy outcomes are influenced by various socio-political factors, making it challenging to isolate ethical dilemmas as purely policy-driven issues. The reliance on secondary data also presents limitations, as it may not capture real-time policy changes or nuanced aspects of refugee experiences. Furthermore,

differences in national legal frameworks and administrative procedures may create discrepancies in data comparability.

Another important limitation is the time constraints of conducting this research as part of a master's thesis. The topic of ethical dilemmas in refugee integration is both complex and broad, fully addressing all its dimensions would require more time than this study allows. Additionally, while Denmark and Germany provide valuable insights for comparison, each country has its own unique historical, political and social context, which introduces specific nuances that may not be fully captured in a cross-national comparison. These differences in national circumstances, such as legal frameworks, political cultures and public attitudes towards refugees, should be considered when interpreting the findings. Also, the broader European context plays a significant role, as EU member states often face external pressures to align their policies with European Union directives, despite national differences. The influence of EU policies can shape how countries respond to refugee integration, adding another layer of complexity to the analysis. These factors must be considered when drawing conclusions, especially in relation to the trends and challenges faced by European countries as a whole.

Despite these limitations, the study's systematic approach to analysing policy frameworks and ethical tensions ensures that it provides a valuable contribution to the understanding of refugee integration dilemmas in Europe. By critically engaging with the limitations of secondary data research, this study maintains methodological rigor and transparency.

In summary, this qualitative research design offers a structured framework for examining the ethical complexities of refugee integration policies in Denmark and Germany. By employing thematic and comparative analysis, this study seeks to generate insights into how these nations navigated the moral and practical challenges of refugee inclusion. The findings will contribute to academic discourse on migration ethics and inform policy debates on balancing national interests with humanitarian imperatives. Moreover, by systematically analysing the ethical tensions embedded in national policies, this research aims to shed light on the broader implications of refugee integration strategies within the European context.

Analysis

This section covers the analysis of the two chosen case studies. Firstly, it covers an overview of the findings in each case study, which will include a timeline of policy enactment by both countries, providing valuable information and key events when addressing the 2015 ‘‘refugee crisis’’ to better explain the reaction of each country and how they navigated this phenomenon, balancing their humanitarian obligations with their national priorities. Secondly, after the description of how each case study reacted, I will make a comparative analysis between both countries in order to compare both cases and reflect on how they reacted, similarly or differently, in this specific context.

This analysis is a thematic one and makes use of three theories, as outlined earlier in this thesis - Per Bauhn’s ethical theory, focusing mainly on concepts like the *Comparable Cost, Fair share* and the tension between *Universalism* and *Particularism*, as these concepts can be used to evaluate the moral reasoning behind refugee policies; Ernest Laclau’s theory of discourse and hegemonic articulation are used to examine how universal ethical values, such as humanitarianism are reframed through nationalist political narratives and how exclusions are legitimised in discourse; And finally, Catherine Dauvergne’s theory of migration control and sovereignty, which provides the structural reading of legal changes and how refugee law mainly helps to assert state authority rather than to uphold universal protection. These theoretical frameworks not only inform the analysis but also serve as basis for thematic and interpretive coding, guiding the reading of legal developments and political rhetoric.

For the following analysis, the themes found through the examination of the data will be incorporated as headings to structure the analysis while the subthemes will be incorporated as subheadings and further described within the sections. A descriptive table of those themes and subthemes can be found at the end of each case study.

Denmark

Denmark's policy response to the 2015 ''refugee crisis'' provides a rich case in order to analyse the tension between universal moral obligations (such as the ones embedded in the 1951 Refugee Convention) and particular national priorities (such as economic, social and cultural interests). Despite being among the first countries to sign the UN 1951 Refugee Convention and being previously known for maintaining a humanitarian immigration system, the Danish government has introduced stricter regulations of immigration in recent years, particularly after the 2015 major influx of refugees entering the country. Today, Denmark has some of the most restrictive immigration policies in the European Union (Carlsen & Toubøl, 2023, p.4).

Although historically adopting a particularist approach to asylum law, Denmark had earlier demonstrated a willingness to take in large numbers of refugees and offer temporary measures to cover immediate humanitarian needs, as in the case of the 1992-1999 civil wars in former Yugoslavia (Carlsen & Toubøl, 2023). Nonetheless, instead of continuing a welcoming posture, mainstream political actors adopted increasingly deterrence-oriented strategies over the years that were aimed at discouraging refugee arrivals. This shift was particularly evident after 2015 with the further implementation of such strategies, like the introduction of the controversial ''jewelry law'', which allowed authorities to seize personal valuables worth over approximately €1,500, including items of sentimental value (The Danish Parliament, Act No.102, 2016).

The following section provides an overview of the many policies enacted in Denmark regarding asylum and integration law within the context of the 2015 ''refugee crisis'', providing a detailed timeline of major events in asylum law and refugee integration between 2015 and 2019, since this period was the most intense in terms of changes and adaptations within asylum law.

Protection

The theme of protection in the Danish case refers to how the state framed its responsibilities toward refugees in legal and ethical terms. This theme generated several subthemes: *Conditional Protection*, *Ethics of Limited Obligation*, *Temporality as a Means of Protection*, *Tightening of Controls and Sovereign Self-assertion* and *Conditional Belonging*. These subthemes were identified through recurring patterns in both legal documents and political discourse that portrayed protection as a limited,

temporary and strategically constrained obligation. They reflect how protection was less a stable right and more a provisional status, granted under narrow conditions and always subject to revision in line with national interests.

Temporality as a Means of Protection

In response to the heightened influx of asylum seekers entering Europe due to the Syrian conflict, in February of 2015, Denmark initially introduced a new temporary protection status for specific groups affected by *''arbitrary acts of violence and attacks on civilians''* (The Danish Parliament, Act No.153, 2015). This specific status provided temporary residence, initially for up to one year, extendable to two years if continued protection was considered necessary. Although this temporary status emerged as a first humanitarian response which intended to emphasise Denmark's commitment to upholding humanitarian responsibilities, it also indicates an emphasis on temporality and conditionality, reflecting a focus on return rather than integration from an early phase. This policy immediately highlights the tension between ethical universalism and ethical particularism. Denmark's emphasis on temporality and restrictiveness of protection highly reflects a particularist logic, prioritising the Danish interests over the long-term necessities of asylum seekers.

This initial approach can be judged using Bauhn's Comparable Cost principle, which implies a state should admit refugees, when the cost of not doing so, is significantly greater for the refugees than the cost incurred by the host society in providing protection. Given the severity of the ''crisis'' at the time and evaluating Denmark's capacity as a high-income state, the early decision to limit protection appears to be ethically lacking. Moreover, considering the Fair share Principle, also introduced by Per Bauhn, that suggests proportional contributions to refugee protection should be based on state's resources, Denmark's initial minimal and temporary approach might reflect an unwillingness to take on its fair share of responsibility.

Consequently, Denmark's initial policy response seems to represent a minimal ethical compliance from Bauhn's viewpoint, suggesting that Denmark was inclined to fulfil only the basic requirements rather than adopting a more robust moral commitment to its humanitarian obligations.

Tightening of Controls and Sovereign Self-assertion

Shortly after introducing this temporary status, Denmark strengthened controls at airports and borders and implemented fines for illegal entry and residence in Denmark, as well as heavy penalties for assisting illegal immigration (The Danish Parliament, Act No.271, 2015). The period this Act was enacted coincided with a major influx of asylum seekers entering the country and was framed politically as necessary for safeguarding national sovereignty and social order. By enacting this law Denmark ought to discourage irregular migration and emphasise control over its borders. This represented a shift from the humanitarian accommodation (provided in the temporary status) to a more deterrence-based approach.

Denmark's policy shift can be seen as an act of sovereign self-assertion, where control over migration becomes central to national identity and political stability, which can be strongly linked to Catherine Dauvergne's theory on sovereignty and migration control. According to Dauvergne, migration law is not just a set of legal procedures, instead it is a symbolic assertion of state sovereignty. By tightening immigration measures, Denmark is not only responding to practical concerns but also reaffirming its sovereign control over who can enter and who qualifies for protection. This could be seen as aligning with Dauvergne's perspective that migration control is a means for states to balance different pressures, aiming to preserve their sovereignty while also demonstrating compliance with international obligations, such as the 1951 Refugee convention.

2015 was marked by a sharp increase in asylum applications, with the number of people seeking refuge in Denmark reaching its highest point, peaking at 21.316 applications (Bendixen, 2025). Following the Danish Liberal party assuming governance in June of that year, the government responded to the growing influx by introducing even stricter integration measures - In September, a new and lower integration benefit replaced the standard social assistance for individuals who had not resided in Denmark for at least seven of the previous eight years, revealing again, a shift toward more conditional and deterrence-oriented approach (European Commission, 2016). Then, in November, a 34-point asylum package was passed (The Danish Parliament, Act No.1273, 2015), allowing for the faster return of rejected asylum applicants, lowering refugee housing standards, and expanding police authority to manage the influx by enforcing border control. This approach was later reinforced in December by the Act No.1499 of December 2015, where measures were implemented that permitted transport operators to be held accountable for

ID checks in the event of provisional border controls. This meant that shipping, bus, and train operators, among others, could face significant fines if they transported passengers into the country without proper identification.

Conditional Belonging

In 2016, the Danish government's approach to refugee integration was not only evident in policy shifts but also strongly articulated in political discourse, most notably in Prime Minister Lars Løkke Rasmussen's New Year's speech, which framed the ''refugee crisis'' as a humanitarian and national challenge, warning that *''Our cohesion is challenged when many arrive in Denmark from altogether different cultures''* (Rasmussen, 2016). While acknowledging that ''*We must become better integrating those who come to Denmark''*, Rasmussen emphasised a conditional approach to inclusion, stating that the government was *''increasing demands on people to provide for themselves''* as well as those *''wanting to obtain Danish nationality''* or *''family reunification''* (Rasmussen, 2016). This rhetoric did not reject refugees' entitlement to protection but instead it redefined it within the context of conditional inclusion, in which rights and recognition became increasingly linked to economic self-sufficiency and cultural adaptation.

These discursive patterns anticipate the restrictive trajectory of legislation enacted in the following months, as it is described below, and it will be more thoroughly analysed within the second theme of this chapter, more specifically in terms of how integration is expressed here as a function of contribution rather than of universal obligation.

In 2016 the deterrence-based approach continued, when early in the year Denmark enacted more legislation that significantly restricted family reunification for individuals under temporary protection (The Danish Parliament, Act No.102, 2016). Under this new law, the family of those affected had to wait three years before being considered eligible to apply for family reunification, as a result, family members of asylum seekers settled in Denmark were often forced to remain in unsafe conditions or pursue their own asylum journeys. Also, permanent residency permit criteria were also made more restrictive under this act, demanding at least six years of residence in Denmark, two and a half years of employment in the previous three years and proficiency in Danish language and culture (The Danish Parliament, Act No.102, 2016). This approach further reflects the

governments emphasis on integration of refugees within Danish values and the promotion of self-sufficiency among migrants and frames integration not as a right but as an earned privilege, conditional under economic utility and cultural assimilation .

Furthermore, this legislation also included a controversial clause that allowed the state to confiscate cash and personal valuables exceeding 10,000 DKK (~1,500€) from arriving asylum seekers to 'compensate' their living costs, this law became known as the ''Jewerly Law''. Although framed as financial fairness, this law was widely criticised by the international community for its symbolic violence and dehumanisation of refugees.

The asylum and integration policies introduced in Denmark throughout 2015 and early 2016 serve as a prominent example of how ethical principles are not only reflected in refugee policies but also selectively reshaped through political priorities. Denmark's strategy exemplified a clear incline towards ethical particularism when analysed through the lens of Per Bauhn's theory. Policies such as, the delay of family reunions for individuals under temporary protection, tightening the requirements for permanent residency and implementing the controversial "Jewellery Law" framed protection as a privilege achieved by means of assimilation and independence rather than an unquestionable right based on universal human dignity. These measures display a revaluation of moral responsibility - the Danish government presented assistance conditional on economic benefit and cultural assimilation rather than defending migrants on the basis of their immediate humanitarian need as asylum seekers. Given the suffering and difficulty experienced by refugees, such as possible extended family separation, these seem out of proportion to any social or economic advantages enjoyed by the host country, which clearly contradicts Bauhn's Comparable Cost Principle.

Moreover, these developments also align with Catherine Dauvergne's notion that migration legislation is increasingly used to establish sovereignty rather than to provide humanitarian protection. The expansion of border control responsibilities to private actors, as present in the ID check requirements for transportation companies, exemplifies a technique of externalising control while formally still complying to international commitments. Similarly, the weight of measures such as the ''Jewerly Law'' foster a view of the refugee as an object of national control and of moral scrutiny, rather than an individual with rights. Such measures intend to strengthen national identity boundaries and express political control over who may enter and who may remain, both of which are basic functions of sovereignty in Dauvergne's viewpoint.

When combined, these changes in policy help address the first research question of this thesis by demonstrating that ethical principles do influence refugee integration but often through a selective and politically charged lens, where particularist principles and sovereignty concerns take precedence over universalist principles.

Integration

In Denmark, the theme of integration emerged as a framework for regulating refugee inclusion through economic performance and cultural alignment. The subthemes that developed under this theme include *Integration as Economic Instrument*, *Conditional Belonging*, *Discursive Construction of Integration*, *The Jobs-First Policy*, and *Work, Worth and Belonging*. These subthemes were generated from data that consistently framed integration as conditional upon immediate labour market participation and behavioural conformity. Together, they reveal how integration was not conceptualised as long-term inclusion, but as a mechanism for evaluating refugees' usefulness and aligning them with dominant social norms.

Conditional Belonging and the Discursive Construction of Integration

In 2016, Denmark's integration strategy shifted towards a more conditional and employment-oriented one, with a growing emphasis on economic self-sufficiency. The beginning of the year was marked by Prime Minister Lars Løkke Rasmussen's New Year's speech, as previously mentioned above. Rather than framing integration solely as a right, he framed it as a process dependent on contribution and economic self-sufficiency.

The speech emphasised Denmark's commitment to assist people in need -*''We Danes are generous. We wish to help. It is an integral part of us as human beings and citizens of a welfare society. It is an integral part of our history as a country. We are open to the world at large and we have a reputation for acting with decency.''* but also clarified the limitations of such assistance, stating that *''We cannot open Denmark to one and all''* highlighting the need to balance humanitarian obligations with national capacity. More importantly, Rasmussen defined integration as a realistic requirement for refugees - *''We need to keep the number of asylum seekers at a reasonable level. That is why the government is pursuing a consistent immigration policy: Increasing demands on people to provide for themselves(...)''* (Rasmussen, 2016). This statement emphasised that refugees' integration in Danish society was not a matter of unconditional support but one that required active participation.

This narrative fits perfectly within Laulau's theory of hegemonic articulation, as the speech constructs an antagonistic barrier between a cohesive national ''we'' and an implied external ''they''- those whose cultural and economic differences could threaten the Danish welfare model. In Laclau's terms, Rasmussen articulates a chain of equivalence between ''cohesion'', ''contribution'' and ''self-sufficiency'' resulting in a discourse in which inclusion is granted, but under strict conditions of conformity. While refugee protection is not explicitly denied, it is reframed through the lens of national sustainability. This is a vivid illustration of how universal concepts like humanitarian responsibility get absorbed and modified by specific national discourses, transforming ethical norms into situational political instruments.

The Jobs-First Policy

The 2016 policy shift was not only discursive but also institutional, resulting in a significant restructuring of the integration system in Denmark. This transition took place in the shape of a tripartite agreement between the Government, the National Association of Local Authorities in Denmark and the Labour market parties in March 2016. This resulted in Denmark embracing a new strategy with a core focus on employment, the programme attempted to prioritise refugees' early labour market integration.

Denmark's previous integration programme, which had been in place since 1999, had already established a strong connection between refugee integration and employability (The Danish Parliament, Act No.474, 1998). Municipalities were responsible for the housing of refugees and for providing Danish language classes, vocational training and employment evaluations, the participation is this programme was mandatory and tightly monitored, if a refugee refused to engage in elements of the programme they could be sanctioned financially since this was tied to welfare benefits. This strategy also contained a ''job-readiness assessment'', that was conducted every three months by the municipality's caseworker where it was evaluated whether the refugee was considered ''job-ready'', this is, if it had obtained the necessary skills (i.e. language, training) to actively participate in job searches. This periodic assessment intended to provide a smoother integration into Danish culture before entering the labour marker programmes (Arendt, 2019).

This changed significantly in the 2016 reforms that were implemented under the Tripartite agreement. Under this reform, the refugees who had arrived after 1 of October

of 2016 were considered ‘’job ready’’ upon arrival, being required to engage in job search immediately and participate in job training within one month after their arrival (Arendt, 2019). Here there was a clear shift from the previous ‘’Human Capital’’ model, which emphasised cultural and language integration before active labour market participation, to a more direct ‘’Jobs First’’ approach emphasising Denmark’s particularist stance. The agreement further led to the development of a new integration programme - Integrationsgrunduddannelse (IGU**),** in English, the basic integration training - designed to gradually integrate refugee into Danish workforce over a two-year period while offering language courses and vocational training. Under this programme refugees and their family members, between the age of 18-50 years old, receive ‘apprentice pay’ while working at least 25 hours and participating in 20 weeks of Danish language classes (The Danish Parliament, Act No.665, 2016).

Denmark’s shift in policy and integration programmes in 2016 represents an important moment in which ethical ideals were reinterpreted to align with national imperatives, reflecting how the integration system was re-shaped to prioritise Denmark’s particular interests while still functioning within the framework of its universal obligations. While the programme seems to preserve a universalist commitment - Refugees are provided with accommodation, training and language support - it also embeds ethical particularism, in which access to rights and ‘belonging’ is strongly connected to the ability to contribute economically.

This approach implies that moral obligations to refugees are conditioned upon evident active participation in labour markets. This shift, when viewed from Laclau’s perspective, demonstrates how ethics operate hegemonically. The reform established a strong chain of equivalence between integration and employment that reframes refugees not as citizens with rights in need of protection but as potential workers whose worth must be demonstrated. In this light, labour becomes the ethical landscape on which belonging is granted or denied. Yet, this reconfiguration also invites criticism from Bauhn’s theory, which warns against reducing moral obligations to simple outcomes. While fostering autonomy through labour might be ethically justifiable, connecting rights to immediate economic contribution risks transforming the refugee into a means to national ends, thereby undermining the ethical principles that should lead integration.

To conclude, Denmark’s 2016 integration reforms reveal how ethical principles are selectively mobilised and reconfigured to meet specific institutional and political aims

rather than disappearing from policy. They highlight the tension between ethical universalism and practical particularism as well as how moral values are transformed into governance through the logic of productivity and national cohesion.

Repatriation

The theme of repatriation in the Danish context focuses on the increasing emphasis on return as a policy objective and a discursive goal. Subthemes such as - *Temporariness, Ethical Retrenchment, Law No.140: Return as a Policy Goal, Permit Reviews and Revocations,* and *Rebranding of the Integration Programme and the Discursive Erasure of Permanence* were derived from repeated references to temporary protection statuses, shifting legal frameworks and the growing institutionalisation of ‘’return’’. These subthemes reflect how repatriation became the endpoint of Denmark’s refugee strategy, reframing protection and integration as short-term measures that were oriented toward facilitating eventual removal.

Law No.140: Return as a Policy Goal

An important development within Denmark’s asylum and integration policy was enacted in 2019 through the Act No.174, L140, which became known as the ‘’Zero asylum policy’’. This signalled a ‘paradigm shift’ in Danish policy – representing a complete reorientation from an integration-based strategy to one focused on repatriation and temporariness, which further emphasised Denmark’s prioritisation and alignment with its particular national interests rather than universal humanitarian commitments (The Danish Parliament, Act No.174, 2019).

Permit Reviews and Revocations

This law explicitly stated that refugee residence permits are now only provided for temporary residence and must be revoked or not extended, when possible, unless doing so would violate Denmark’s international obligations. Therefore, residence permits are now issued for only one to two years and aspects such as, employment and language proficiency no longer have a positive impact in residency assessments.

It is important to mention that, shortly after Denmark introduced this new legislation, the Danish Immigration Service introduced the ‘’Project Damascus’’ in order to assess the residence permits of refugees from Syria, on the basis that the conditions in Damascus had changed. From 2019 to 2021, 1,115 cases have been assessed and in 381

of these cases, the Immigration Service decided to revoke the refugee's residence permits (Danish Institute for Human Rights, 2022, p.30).

The act also enabled the Ministry of Immigration to put a limit on family reunification, especially during times when administrative or municipal capacity are under stress. It further imposed stricter restrictions and harsher penalties on individuals considered a threat to national security, such as, rejected asylum seekers that had committed crimes, and included the possibility of forced residence in remote areas like Lindholm Island (The Danish Parliament, Act No.174, 2019).

Rebranding of the Integration Programme and the Discursive Erasure of Permanence

This legislative reform was followed by significant discursive adjustments with the rebranding of the integration programme and integration allowance as the *''Self-Sufficiency and repatriation programme''* and the *''transitional allowance''* (The Danish Parliament, Act No.174, 2019) – which frames the refugee's presence in Denmark as intended to be temporary and transitory. Such developments indicate a stronger emphasis that integration is no longer an ethical or social aim, but rather a short-term strategy of containment, reflecting a more limited approach that favours repatriation.

When analysed through Ernesto Laclau's discourse theory, these changes in 2019 represent a substantial rearticulation of integration itself. The traditional signifiers of integration, such as - belonging, mutual adaptation and contribution - have now been stripped of their previous ethical meaning and re-signified around autonomy and return. This rhetorical shift portrays refugees not as future citizens but as temporary workers which are destined to be repatriated. Laclau helps us understand how Denmark creates a new common sense in which ''self-sufficiency'' is no longer considered a pathway to community membership but a lead up to exclusion through repatriation. By rebranding benefits and programmes around ''repatriation'', the state discursively erases permanency, fostering a sense of exclusion without necessarily violating international norms and therefore universal principles. In this sense, the redefining of these concepts change the symbolic landscape in which refugee policy is justified, making restrictive measures appear both reasonable and ethically neutral.

Moreover, Bauhn's ethical universalism vs. ethical particularism informs the normative conflicts behind this transition. By actively dissociating integration efforts

from long-term residency, Denmark moves from a universalist ethic of inclusion, in which refugees are entitled to stable protection and active participation, to a particularist ethic in which national interests and demographic control take precedence. The push for repatriation, even when its uncertain or impossible (as in the case of Syria at the time) reveal a conscious decision to prioritise state sovereignty over moral consistency. Here, the ethical logic of human rights, which had been previously incorporated in earlier integration strategies (although sometimes in questionable ways), is overshadowed by the state's determination to limit refugee presence in Denmark.

This reasoning is further repeated in Catherine Dauvergne's notion of the diminishing refugee law space, in which legal frameworks are increasingly used to exclude rather than to protect. In Denmark's case, refugee law has become a tool for handling temporary situations rather than providing long-term solutions. The proactive assessment and revocation of over 1,000 Syrian refugee residence permits, despite the lack of diplomatic relations with Syria and therefore the impossibility of forced return, exemplifies how the state uses legality to place refuges in a state of suspension, not fully protected but also not fully excluded. Given this, Dauvergne's theory helps us understand how legislation becomes regulation of ''undesirables''.

In conclusion, the 2019 ''paradigm shift'' in Denmark's asylum policy represents an important transformation in how the state conceptualizes refugee presence, not as a pathway to integration but as a temporary exception that must be handled and eventually reversed. Through the lenses of Laclau, Bauhn and Dauvergne we are able to recognize how this shift restructures the discursive and legal foundations within refugee policy - integration loses its ethical promise, universalist principles are subordinated to national interests and refugee law further becomes a tool of containment rather than of protection. Denmark's ''Zero Asylum Policy'' represents a political shift and also a deeper ethical retrenchment, framing the refugee as a subject to be temporarily regulated before being repatriated.

Conclusion

The evolution of Denmark's asylum and integration policies between 2015 and 2019 reveal a striking redefinition of the ethical and legal frameworks surrounding refugee governance. What initially appeared to be a response to international humanitarian obligations gradually evolved into a carefully designed system of conditionality,

economic instrumentalization and temporariness. Nonetheless, this progression does not indicate the absence of ethical considerations, instead it signifies a strategic recalibration of ethical principles, to align with specific national priorities. Through the successive changes of Denmark's integration and asylum legislation, we can observe a clear transition from inclusion to regulation, from rights to obligations and finally, from settlement to return.

At the core of this transition is the construction of conditional belonging, in which the refugee's claim to protection is no longer assumed, instead, it must be proven through contributions. This is evident in the 2016 discursive shift articulated in Prime Minister Rasmussen's New Year's speech, which frames integration as a ''contractual'' relationship based on self-sufficiency rather than in moral or humanitarian obligations. The narrative constructs a clear distinction between an imagined unified Danish ''we'' and an external ''they'', who must comply to productivity and cultural norms in order to be accepted. Laclau's theory of discourse and hegemony demonstrates that such framing rearticulates humanitarian ethics through national interests, where universal principles are not rejected but assimilated and reframed within a logic of conditional inclusion.

This conditionality is further institutionalized through the *Jobs-First* integration strategy which emphasises labour market participation as the main criteria for worth and the pathway to belonging. The 2016 Tripartite Agreement substantially altered the structure of integration by reversing the order of inclusion: instead of preparing refugees through cultural and language adaptation, the new model declared them ''Job-ready'' upon arrival. Integration was now judged in terms of economic success through immediate employment participation. While this model includes certain universalist aspects, such as vocational training and language support, it does so within a framework that clearly relates rights to potential outcomes. Bauhn's ethical lens help us understand the downsides of this model – by tying ethical commitments (as refugee integration) to economic performance, the refugee becomes a ''means to a goal'' instead of their own integration being the goal. The ethical problem here is not in demanding autonomy or contribution of refugees, but in allowing such demands to overshadow the fundamental principles of protection, dignity and equal worth.

The culmination of this progression was the 2019 ''paradigm shift'' under the Act. 174 L140, which reframed the whole purpose of refugee presence in Denmark. Integration was no longer the ultimate goal, instead, temporariness and repatriation

became the central policy objectives. Through legal changes, such as short-term residence permits, permit reviews and assessment and revocation of Syrian protection statuses, the state not only restricted the period of protection but also tried to reverse it. The rebranding of the integration programme into the "Self-Sufficiency and Repatriation Programme" discursively erased the possibility of permanent inclusion, reducing refugees to temporary figures whose presence must eventually be reversed. From a discursive perspective, this represented a radical rearticulation of refugee policy. Language, employment and cultural adaption, which were traditional signifiers of integration, lost their ethical value and were re-signified around exclusion and return.

According to Laclau's discourse theory, the symbolic order of refugee governance was reconstructed - self-sufficiency, which was formerly a prerequisite for membership, became a forerunner to exclusion through repatriation. Simultaneously, Bauhn's distinction between ethical universalism and ethical particularism emphasises the underlying normative conflict here. Denmark's policies are progressively prioritising national sovereignty, demographic control, and welfare preservation over the moral need to protect vulnerable people. Even in circumstances when repatriation is neither safe nor practical, like as Syria, Denmark's emphasis on return reflects a particularist logic that takes precedence above ethical consistency. Finally, Dauvergne's theory is critical for understanding how legality may be used not to protect but to exclude. The legal structures that previously provided protection are reconstructed and used for restriction, control, and revocation. The refugee is no longer seen as an individual in need of long-term solutions but rather a subject caught in a legal limbo, where its neither entirely integrated nor totally dismissed.

To summarise, Denmark's trajectory from 2015 to 2019 represents more than a series of policy shifts, it exemplifies a larger ethical and discursive shift in how the state conceptualizes refugee integration. Across all three themes – Protection, Integration, and Repatriation – refugees are not framed as future citizens or as members of a shared moral community, they are framed as regulated subjects whose worth is measured by their economic contribution and whose presence is tolerated only under strict conditions. Even though Denmark has remained within the boundaries of international law, it has reinterpreted the concept of integration in ways that contradict the essence of humanitarian protection.

The main themes and subthemes generated through the analysis of the Danish case, are as follows:

THEMES	SUBTHEMES
Protection	Ethics of Limited Obligation Conditional Protection Temporality as a means of Protection Tightening of Controls and Sovereign Self-assertion Conditional Belonging
Integration	Integration as an Economic Instrument Conditional Belonging Discursive Construction of Integration The Jobs-First Policy Work, Worth and Belonging
Repatriation	Temporariness Ethical Retrenchment Law No.140: Return as Policy Goal Permit Reviews and Revocations Rebranding of the Integration Programme and the Discursive Erasure of Permanence

Germany

Germany's response to the 2015 ''refugee crisis'' represents a valuable case in which to explore the tensions between ethical universalism and ethical particularism in refugee integration. Initially, Germany was perceived as an example of moral leadership when the then Chancellor Angela Merkel made her famous statement ''Wir Schaffen das'' (''We can do this'') and made the decision to allow refugees to cross the Austrian German border, incorporating a sense of openness and humanitarianism. While many countries in Europe were adopting restrictive approaches to the humanitarian ''crisis'', Germany intended to show a ''friendly face'', emphasising their values and obligations as a member of the EU and International Refugee Regimes such as the 1951 Refugee Convention.

However, by the beginning of 2016, this liberal approach came to an end and Germany initiated a path of more conditional protection, deterring refugees from entering German territory, limiting benefits, and introducing reforms to asylum and integration law that ought to regulate the ''crisis''. Although Germany remained formally committed to its international legal obligations, such as the 1951 Refugee Convention, it implemented significant legislative and discursive shifts that intended to align refugee governance with national priorities, such as political stability and social cohesion.

The following section entails the analysis of the German case, providing the key moments and legislations enacted in the context of refugee integration when addressing the 2015 ''refugee crisis''. This will be done by analysing Germany's asylum and integration reforms throughout 2015-2020, as this was the main period of changes and reforms relevant to the ''crisis'' within the country, highlighting the ethical tensions at play.

Protection

This theme exposes how Germany initially adopted a more open asylum framework in response to the refugee influx, before gradually introducing restrictive measures. This main theme gave rise to two central subthemes: *Temporary Moral Opening* and *The Shift Toward Restriction: Asylum Packages I and II*. These subthemes were identified through the analysis of political discourse and legal reforms that initially embraced a humanitarian stance and later reasserted control. This transition from openness to restriction

demonstrates how protection was redefined over time, moving from an ethical obligation to a conditional and managed responsibility.

Temporary Moral Opening

Germany's initial response was marked by the August 2015 summer press conference where the then-Chancellor Angela Merkel employed a rhetoric of deservingness for war-fleeing refugees, where she described the displaced as individuals who often had *''to overcome situations or endure fears that would probably just make us collapse''* (Lemay, 2024, p.120). In this press conference, Merkel portrayed Germany as a prosperous and redeemed nation for welcoming refugees, arguing that *''our freedom, our rule of law, our economic strength, the order in which we live together – That's' what people dream of, who have come from persecution, war, arbitrariness in their lives. The world looks up to Germany as a land of hope and opportunity, and that was not always the case''*. In her speech, Merkel further referenced several challenges that the country had faced in its recent history, like its reunification. In this light, Merkel framed the refugee situation as new national challenge, stating that '*'We have already achieved so much – we can do it''*, in German '*'Wir Schaffen das''* (Lemay, 2024, p.121). This sentence came to symbolize not just Germany's administrative capacity, but also its deep ethical commitment to upholding human dignity.

This sense of openness and humanitarianism was not only a discursive one, but it also translated into actual practices, such as the suspension of the Dublin III Regulation. Although Germany traditionally employed a more restrictive asylum policy and supported the Common European asylum-policy framework – from which Germany benefited immensely due to its geographic position, since this regulation specifies that the EU member state of first arrival is the one responsible for assessing the asylum claims – it decided in September of 2015, in agreement with Austrian Chancellor Werner Faymann, to not follow the Dublin III Regulation and allow refugees to reach German borders. This approach was largely a response to the restrictive measures employed by several countries of the European Union's external borders, such as Greece, which was struggling to provide adequate humanitarian conditions, and Hungary, who chose to close their borders (Koch et al., 2023). In this sense, Germany was asserting itself as a humanitarian example, capable of taking its fair share and upholding its humanitarian obligations, therefore embodying a universalist approach grounded in compassion and responsibility.

This initial approach, a moment of openness, can be interpreted as a strong expression of ethical universalism in refugee governance, since Germany initially positioned itself as a state willing to uphold moral responsibility based on recognition of shared human dignity. In line with Per Bauhn's theory, Germany's actions reflected the Fair Share Principle, given that the country was willing to take on a disproportionate burden compared to other EU member states due to its stronger economic and administrative capacity. While it also aligned with the Comparable Cost Principle, as Germany decided to suspend the Dublin III Regulation, acknowledging that the harm refugees were facing in border member states like Hungary and Greece, far outweighed the possible strain Germany would endure in helping the ''crisis''. Moreover, Merkel's discourse during this period exemplifies Laclau's concept of hegemonic articulation, where a universal moral value – in this case, the right to asylum – was elevated through national political identity. During this period, refugees were portrayed as victims of persecution whose suffering demanded recognition, while Germany was symbolically positioned as a morally redeemed and responsible actor. By invoking Germany's historical resilience and democratic values, Merkel rearticulated national identity through a universalist frame – not just as a strong economic state but as a humanitarian leader.

This moment, central to this analysis, illustrates how ethical principles, while sincerely mobilized, might often remain vulnerable to setbacks once national capacity, public sentiment or institutional strain come into question, as I will delve into briefly.

The shift toward restriction: Asylum packages I and II

This initial sense of openness was short-lived. After the suspension of the Dublin III regulation, Germany was face with an administrative overload, having over ten thousand border crossings a day, the government soon abandoned its open and positive approach, and on 10th of November of 2015 decided to re-apply the Dublin procedure for asylum seekers, except for the ones entering the Schengen area via Greece (Collignon, 2020, p.28). While working domestically on processing the asylum seekers arrivals, Germany was also actively working on its external policies, blocking the ways in which the asylum seekers arrived, with the ''closure of the Balkan route'' and the EU-Turkey Agreement which was concluded in November as well, under which Turkey committed to restrict border crossings to Europe and improve conditions and prospects of refugees living in Turkey (Lemay, 2024, p.124; Grote, 2018, p.24). In practical, this led to an increasing

blockage of possible pathways into the EU and a decline in arrivals by the beginning of 2016 (Koch et al, 2023, p.5).

These measures were accompanied by the passing of the Asylum Package I (Asylum Procedure Acceleration Act) of October 2015 that contained various changes in the German asylum procedure. It introduced measures aimed at fastening the asylum process while also facilitating the return of individuals without legal stay and the elimination of incentives for unjustified asylum claims, such as, the reduction of cash benefits, replacement of cash payments with benefits in kind, longer stays in reception centres (six months instead of the previous mandatory three) and a prohibition of employment for asylum seekers from ‘’safe countries of origin’’. Furthermore, this list of ‘’safe countries’’ was expanded to include Albania, Kosovo and Montenegro. These restrictive measures were intended to discourage asylum applications for migration purposes. Nonetheless, this reform also included steps to support the integration of asylum seekers ‘’with good prospects of remaining’’, such as, the opening access to integration courses, job-related language training, the ease on restrictions for temporary employment and the promotion of labour market participation (Federal Republic of Germany, Act No.40, 2015, p. 1722). While this first Asylum Package shifted Germany’s initial open response to the refugee ‘’crisis’’ to a more restrictive course, it also offered some positive actions for asylum seekers.

Yet, this restrictive course was deepened with the passing of the Asylum Package II in March 2016, that contains the Act on the Introduction of Accelerated Asylum Procedures, which intended to further tighten the German Residence and Asylum Act (Koch et al, 2023, p.12). This package aimed, again, at speeding up the process of asylum procedures, affecting mainly the asylum seekers considered to be of a low chance of success who were now forced to go through fast-track procedures, limiting even further their chances. Additionally, it specified that a large part of these procedures is to be assessed in the arrival centres and deportations are to be conducted more quickly and easier, including that a serious illness would no longer be a reason to delay or prevent the deportation. Moreover, another key element of this reform was the two-year suspension of family reunification rights for refugees with subsidiary protection (Federal Republic of Germany, Act No.12, 2016, p.390).

In addition, and mainly due to the events of New Years Eve in Cologne – where it was extremely mediatized that ‘’ *dozens of groups of North African and Arab-looking*

men'', including asylum seekers, had assaulted more than ninety women that night (Lemay, 2024, p.124; Deutsche Welle, 2016) – there was a tightening on deportation law for delinquent foreigners under the Act of Facilitated Deportation of Delinquent Foreigners. It contained that, custodial sentences, juvenile sentences and suspended sentences could all be reasons for deportation and asylum seekers who had committed a crime could be denied legal recognition as a refugee more consistently than before (Federal Republic of Germany, Act No.12, 2016, p.394).

This rapid policy shift marks a clear ethical and discursive departure from the initial openness of Germany's 2015 response. From Per Bauhn's perspective, the measures enacted after the temporary suspension of the Dublin III Regulation, such as, the fast-tracking of asylum claims, the restriction of benefits and the introduction of barriers to family reunification, demonstrate a turn toward ethical minimalism. Instead of upholding equal moral obligations toward all refugees, the German state began making distinctions between those considered "deserving" of full protection and those whose claims were deemed less urgent. The inclusion of Albania, Kosovo, and Montenegro as "safe countries of origin", the two-year suspension of family reunification for individuals with subsidiary protection and the increased ease of deportation, reflect a prioritisation of national burden management over a consistent commitment to humanitarian principles. In Bauhn's terms, the Comparable Cost Principle was no longer guiding policy in Germany, instead, political cost to the state gradually outweighed the potential harm to refugees.

This shift is also reflected in the changing discourse surrounding refugees, which can be read through Laclau's lens of hegemonic articulation. Merkel's phrase *"Wir schaffen das"*, that was once a symbol of compassion and national confidence, gradually lost its universalist tone. Refugees were no longer framed as individuals worthy of protection by virtue of shared human dignity but increasingly constructed as figures to be managed based on their perceived threat or utility. The events of New Year's Eve in Cologne, and their intense media coverage, catalysed a rhetorical rearticulation of the refugee subject as potentially dangerous, culturally incompatible, or criminal. This allowed for a new hegemonic formation, creating a chain of equivalence between ''security'', ''national identity'' and ''public order'', forming a discourse where national protection became closely tied to managing refugees. Although humanitarian responsibility was not rejected, it was reframed to prioritise safety and social cohesion.

This is a clear example of how universal ethical principles were adapted and reframed within Germany's specific political and social context to serve as pragmatic justifications for policy measures.

From the perspective of Catherine Dauvergne, this tightening of asylum and deportation laws also reflect a strategic reassertion of state sovereignty. While Germany initially appeared to relax its legal boundaries, the rapid return to regulation, through both internal restrictions and external agreements such as the EU-Turkey deal, demonstrates how migration law remains one of the few areas in which states can unilaterally assert control. The legislative changes passed between late 2015 and early 2016 expanded the legal mechanisms through which the state could determine who qualifies for protection and under what conditions, reaffirming the idea that sovereignty is not just enforced at borders, it is actively constructed through laws that manage presence and rights. As such, Germany's shift from an initial ethical openness to increasingly restrictive measures provide a clear example of how humanitarian commitments can coexist with, and be subordinated to, the logic of sovereign self-preservation.

To conclude, Germany's early reaction to the 2015 refugee arrivals reflected a clear commitment to universal moral principles and a willingness to lead by example. Yet, this openness quickly became more conditional, shaped by public concerns and efforts to regain control, both internally and through external agreements – aligning closer with a national particularist notion. Although the language of solidarity and responsibility remained present, it became increasingly tied to national interests and legal frameworks that defined *who* could stay and under *what* terms. This shift highlights the tension at the heart of refugee policy - the desire to act ethically on a global scale, while also managing domestic realities and preserving sovereign authority. This reflects how moral intentions, though sincere, can become constrained by the practical and political demands of state governance.

Integration

The theme of integration in Germany focuses on how the state conditioned inclusion on economic contribution and compliance with imposed rules. The subthemes that emerged include *Contribution*, *Conditional Belonging*, *Conditionality*, and *The Discourse of Utility*. These were generated from policy shifts and official rhetoric that framed integration as something to be earned rather than granted. The subthemes illustrate how

Germany constructed a model in which refugees had to demonstrate their value through labour market participation and adherence to the government expectations in order to access rights and long-term stability.

Conditionality and the Discourse of Utility

By 2016, Germany's approach to refugee integration had shifted significantly toward a logic of conditional inclusion, where protection was no longer provided exclusively on humanitarian grounds but increasingly tied to the refugee's potential to contribute economically and socially. Refugees were no longer viewed just as vulnerable persons in need of care, but also as potential participants in the national economy - people whose long-term participation was conditional on their willingness and capacity to integrate on the conditions set by the government. This approach was formalized with the passing of the Integration Act in August 2016, which introduced a new set of conditions for obtaining permanent residence – among other provisions, it required that recognized refugees must comply with specific residency requirements, actively participate in integration courses and engage in the labour market in order to obtain a more stable legal status. Additionally, the act also expanded language and integration courses and improved access to training opportunities and the job market (Federal Republic of Germany, Act No.39, 2016, p.1939; Koch et al, 2023).

In practical terms, these measures helped facilitate participation and opened new pathways for those seen as having ''good prospects of staying''. However, integration was no longer framed as an unconditional right or as a social responsibility of the host state, instead, it was reframed as a contractual relationship. Refugees were expected to demonstrate effort and alignment with national norms in order to ''earn'' their place in German society. This signalled a departure from a purely humanitarian model of inclusion to one rooted in expectations of economic utility and behavioural compliance. It reflects a deeper transformation in how belonging is constructed - inclusion was now made conditional, not only on the basis of legal recognition but also as measurable progress toward self-sufficiency. In this way, the Integration Act both enabled and limited inclusion – it supported refugees, but only under specific terms, reinforcing the idea that protection alone was not enough, thus reflecting a particularist approach.

Yet again, using the lens of Laclau's discourse theory, this marked a significant shift, where universalist language – solidarity, rights, and dignity – was not abandoned

but recontextualized. Refugees were no longer framed as passive recipients of humanitarian care, instead they were recast as active agents whose worth was to be demonstrated through their contributions to the national economy and cultural cohesion. In Laclau's terms, a chain of equivalence was formed between ''economic contribution'', ''cultural assimilation'' and ''conditional inclusion''. Within this chain, inclusion became dependent on meeting expectations of economic independence and cultural conformity, transforming the ethical language of integration into one grounded in economic pragmatism and conditional belonging.

For Bauhn, this shift represents a troubling ethical development, as it was previously analysed in the Danish case. While encouraging refugees to participate in the labour market and integrate them economically may be ethically defensible, linking basic rights, such as residency or permanent status, to economic performance risks damaging the inherent dignity of refugees. It places an ethical burden on individuals to prove their worth to the host society, rather than recognising their worth as individuals deserving of protection in their own right.

In summary, in 2016, Germany's integration policy increasingly reflected a turn from rights-based inclusion to conditional participation. While the Integration Act offered important tools to support refugee integration, it did so through a frame of expectations, performance and economic contribution. This redefinition of belonging - from a humanitarian obligation to a conditional contract - reveals how ethical principles of solidarity were rearticulated around national interests.

Repatriation

In the German case, the theme of repatriation describes the evolving focus on return and temporary legal statuses. The subthemes - *Get Out, Orderly Return, Temporariness* and *Ethical Retrenchment* - were derived from legal and discursive developments that introduced new mechanisms for regulating refugee stay and enforcing deportation. These subthemes reflect how repatriation became central to asylum governance, not only through legal measures such as *Duldung* statuses but also through a discursive emphasis on compliance and return. Together, they show how Germany shifted toward a model that normalised temporariness and managed exclusion.

Get Out and Orderly Return Act

Between 2017 and 2020, Germany increasingly shifted its focus from inclusion toward a focus on return. Repatriation and return became central pillars of German refugee governance, as a series of new legislation was enacted that portrayed the idea that protection was no longer a long-term commitment, but a temporary allowance conditional on cooperation.

This shift began with the passing of the Act on Better Enforcement of the Obligation to Leave the Country, in July of 2017, which became known as the ‘’Get Out of Here’’ Act. This legislation significantly expanded the state’s ability to detain individuals awaiting deportation, imposed stricter conditions for individuals under *Duldung* (tolerated stay or temporary suspension) – a specific status that does not offer legal residency but merely postpones deportation until the barriers (missing documents, medical conditions etc.) preventing removal are resolved (Koch et al, 2023, p.10) – and allowed authorities to extract and examine data from asylum seekers’ phones or other personal devices. Furthermore, this act also allowed for all asylum seekers, including children, to be accommodated in initial reception centres until the end of their procedures (with a maximum of two years) (Federal Republic of Germany, Act No.52, 2017, p.2780; Koch et al., 2023).

These measures were extended further with the Second Act on Better Enforcement of the Obligation to Leave the Country, called Orderly Return act, that came into force in August 2019. This legislation built on the previous act by introducing new legal grounds for detention, implementing additional sanctions for individuals failing to leave the country and created a new *Duldung* category, the Duldung light, this applied to individuals with ‘’unclear identity’’ who were deemed uncooperative in facilitating their own deportation - when failing to present valid passports (which is extremely common among asylum seekers) or refusing identity verification procedures. Those considered under Duldung light were subject to bans on employment and reductions in welfare benefits, signalling a clear shift from conditional protection to punitive management (Federal Republic of Germany, Act No.31, 2019, p.1294; Koch et al., 2023). While these laws did not openly violate international refugee obligations, as the 1951 Refugee Convention, it expanded the legal grey zones in which asylum seekers could be contained indefinitely under precarious circumstances.

Between 2019 and 2020, Germany introduced a broad set of legislative reforms to its asylum, residence and social welfare laws, collectively known as the Migration package (Koch et al., 2023, p. 12). This package consisted of seven different laws, including the previously mentioned Orderly Return Act, as well as the Foreigner Employment Promotion Act (August 2019), the Act on Duldung in Vocational Training and Employment (January 2020), and the Skilled Immigration Act (March 2020). These reforms introduced new obligations and sanctions related to identity verification, further restricted or excluded access to social benefits in some specific cases and created new legal pathways such as the ‘’training and employment Duldung’’ (Federal Republic of Germany, Act No. 26, 2019, p.1021), while also expanding opportunities for vocational training and easing immigration procedures for skilled workers (Federal Republic of Germany, Act No.31, 2019, p.1301).

While these reforms introduced certain openings for integration through employment, they did so selectively and under strict conditionalities. Legal status – and by extension, access to rights – became increasingly dependent on an individual’s perceived economic utility and compliance with bureaucratic requirements. Rather than offering stable inclusion, these reforms institutionalized a framework of stratified belonging, where only certain categories of refugees or tolerated individuals could access meaningful pathways to participation. This dual logic of rewarding cooperation and contribution while penalizing non-compliance signalled a broader shift in refugee governance from protection to performance-based legitimacy.

This legal and discursive shift toward repatriation and conditional presence reflects a deeper reconfiguration of the ethical foundations of refugee protection. From Per Bauhn’s perspective, these reforms demonstrate a clear move away from ethical universalism toward ethical particularism. These return-focused measures, especially the introduction of Duldung light status and the increasingly punitive consequences for non-cooperation, indicate a clear retreat from the Comparable Cost Principle. Instead of assessing state obligations through a proportional lens - balancing the harm faced by individuals against the cost to the host society - these policies prioritise administrative efficiency and deterrence. The burdens imposed on asylum seekers facing indefinite legal limbo, restrictions on employment and social marginalization, far outweigh the limited state benefit in avoiding long-term inclusion. Rather than protecting those most

vulnerable, the system began to reward only those who could perform compliance, ethically narrowing the scope of who is considered worthy of support.

Through the lens of Ernesto Laclau, this evolution also marks a discursive rearticulation of the refugee subject. Where the earlier phase of Germany's response framed refugees as individuals deserving of care and solidarity, the post-2017 policies increasingly constructed them as non-compliant actors, potential abusers of the system, or burdens on national welfare. This reshaped the symbolic figure of the refugee to fit a political project that prioritised order and conditionality. Policies such as the Orderly Return Act redefined the state's ethical responsibility, not as one of long-term protection, but of ensuring ''responsible exits'', where moral obligations are reframed as bureaucratic tasks. This shift allowed for exclusionary practices to be justified not as moral failings, but as technical necessities.

Moreover, Catherine Dauvergne's theory helps explain how these legal instruments serve not only to manage migration but to further reassert state sovereignty. In a context where states have ceded authority in many policy domains, migration remains a space where sovereign control is both symbolically and legally enforced. The creation of legal grey zones, such as Duldung light, does not openly violate international law but instead expands the state's capacity to manage non-citizens through temporary and precarious statuses. Within this law, migrants are neither fully included nor clearly excluded, they are kept in a state of legal suspension, where rights are fragmented and dependent on behaviour and bureaucratic compliance. In this way, law becomes a tool of containment, not protection, and the ethics of refugee governance are restructured around sovereignty rather than solidarity.

To summarise, between 2017 and 2020, Germany's approach to refugee governance underwent a considerable shift. Repatriation and return became fundamental to the legal and rhetorical environment, signalling a departure from long-term inclusion and towards a paradigm of conditional and transitory presence. While phrased in administrative and technical terms, these developments had profound ethical implications. The use of punitive measures such as - the Duldung light, enhanced detention powers and harsher conditions - redefined the extent of protection and limited access to rights depending on perceived compliance and utility. This pattern reflects a larger ethical retrenchment, in which specific national priorities - such as administrative

efficiency, political stability and sovereign control - have come to override universal humanitarian principles.

Conclusion

Germany's response to the 2015 ''refugee crisis'' stands as a revealing example of the evolving ethical tensions between universal moral commitments and particular national interests in refugee integration. Initially marked by a powerful humanitarian gesture - symbolized by Merkel's iconic "Wir schaffen das" - Germany positioned itself as a moral leader willing to act on the principles of solidarity, dignity and shared responsibility. The suspension of the Dublin III Regulation, framed through the lens of ethical universalism, demonstrated a rare political willingness to assume disproportionate responsibility in the face of a humanitarian challenge.

However, as public anxieties rose and institutional pressures mounted, this moment of openness quickly gave way to a more restrictive and conditional policy trajectory. The introduction of the Asylum Packages I and II marked a clear departure from universalism, embedding distinctions between "deserving" and "undeserving" applicants, reducing family reunification rights and accelerating deportation procedures. These reforms, as analysed through Per Bauhn's framework, illustrated an increasing reliance on ethical particularism, where obligations were no longer guided by proportionality or shared human vulnerability but shaped by calculations of national burden and public acceptance.

This trend continued in the area of integration, where the 2016 Integration Act redefined belonging through a lens of economic contribution and behavioural compliance. Refugees were no longer framed merely as individuals in need of protection, but as potential contributors whose access to stability depended on performance. While these measures created pathways for participation, they also reinforced stratification and conditionality, signalling a transformation of inclusion into a contractual relationship. From Laclau's perspective, this shift reveals how universalist language, such as solidarity and dignity, was rearticulated to support a national discourse focused on utility, control and conditional acceptance.

Finally, Germany's increasingly return-focused strategy between 2017 and 2020, emphasised by the Orderly Return Act and the creation of Duldung light, marked the consolidation of a legal infrastructure designed to contain rather than integrate. Here,

Catherine Dauvergne's theory proves particularly relevant - the law became a vehicle not for protection, but for sovereign self-assertion, establishing grey zones of legal presence where individuals remained indefinitely precarious. Migration policy consequently functioned less as an ethical project and more as a means to preserve national order, selectively enforcing rights based on cooperation and control.

Overall, Germany's trajectory between 2015 and 2020 reveals how the ethics of refugee integration can be mobilized, transformed and eventually constrained by state priorities. While humanitarian discourse remained present, it was increasingly redefined to align with a framework of conditionality, performance and sovereignty. This case demonstrates that ethical principles in refugee governance are not abandoned absolutely but instead they are reinterpreted through the shifting demands of political realism. Germany's approach, therefore, captures the core dilemma at the heart of this thesis: how the tension between ethical universalism and ethical particularism plays out in practice - shaping who is included, under what terms and at what ethical cost.

The main themes and subthemes generated from the analysis of the German case, are as follows:

THEMES	SUBTHEMES
Protection	Temporary Moral Opening The Shift Toward Restriction: Asylum Packages I and II
Integration	Contribution Conditional Belonging Conditionality The Discourse of Utility
Repatriation	Get Out Act Orderly Return Act Temporariness Ethical Retrenchment

Comparative Analysis

This section provides a comparative analysis of Denmark and Germany's response to the 2015 ''refugee crisis'', focusing on how each country navigated the ethical tensions between universal moral obligations and particular national interests. Although both countries remained formally committed to international legal frameworks such as the 1951 Refugee Convention, their internal policies reveal significant differences in how ethical principles were interpreted and applied while also at times being redefined.

This analysis follows the same three themes established in the individual case studies: Protection, Integration and Repatriation. Through these themes, this chapter explores how both countries combined moral duty with political pragmatism, as well as how the refugee subject was constructed and regulated in their distinct national settings. The research draws on the theoretical viewpoints of Per Bauhn, Ernesto Laclau and Catherine Dauvergne, providing a critical lens through which to evaluate both the similarities and differences in Denmark's and Germany's approaches to refugee integration between 2015 and 2020.

Protection

Although both Denmark and Germany implemented policies that increasingly restricted access to asylum and protection, each state's starting point and trajectory were significantly different.

Germany initially positioned itself as a humanitarian leader by suspending the Dublin III regulation and welcoming a significant number of refugees, with Merkel's slogan ''Wir Schaffen das'' symbolising a universalist commitment to moral responsibility and international cooperation. For a brief period, Germany embraced a framing that recognised refugees as victims of persecution while emphasising its ethical and legal commitments. From Bauhn's perspective, this moment reflected an application of both the Fair Share Principle and the Comparable Cost Principle, as Germany assumed a disproportionate responsibility based on its capacity. Additionally, from Laclau's perspective, this moment can be seen as an attempt to construct a hegemonic articulation around a chain of equivalence linking ''responsibility'', ''solidarity'' and ''national resilience''. Merkel's discourse temporarily brought together diverse demands - such as refugee integration, European leadership and Germany's historical responsibility - into a shared political vision symbolised by the phrase ''Wir Schaffen das''. In this early phase,

the refugee was not portrayed as a burden but as a figure through whom national identity and moral leadership could be affirmed.

Denmark, on the other hand, never underwent a comparable ethical openness. From the beginning, its approach was rooted in ethical particularism, with a focus on preserving the national welfare state and social cohesion. Policies such as the so-called ''Jewellery Law'' transmitted a message of deterrence and from Laclau's perspective the refugee subject was framed early on as a possible threat to the Danish way of life, rather than someone deserving of unconditional protection. This reflects a different hegemonic logic than the one seen in the German case - Denmark constructed a stable chain of equivalence connecting *sovereignty*, *welfare preservation* and *cultural cohesion*, where humanitarian norms were subordinated to a national identity.

While Germany momentarily tried to articulate a hegemonic universalist discourse, it rapidly shifted toward containment and selectivity. Denmark never attempted such articulation, instead it maintained a consistent strategy of limiting obligations. Yet, in both cases, as Dauvergne suggests, sovereignty is reasserted – whether through Denmark's particularly framed restrictions or Germany's legal recalibration following its brief moral opening. Ultimately, both states returned to particularist frameworks that emphasised control and distinction.

Integration

As the initial shock of the ''crisis'' stabilised, both countries shifted their efforts toward integrating those who were more likely to remain, but under more restricted conditions. In Germany, the 2016 Integration Act reflected a significant shift toward performance-based logic of inclusion. Access to permanent residency was made conditional upon participation in integration and language courses, compliance with residency requirements and participation in the labour market. While this legislation encouraged access to services and programmes, they simultaneously reframed integration as something to be earned rather than a right tied to protection.

Denmark's integration strategy had been following this conditional pattern for years before the ''refugee crisis''. Nonetheless, during this period refugees were put in activation programmes that prioritised rapid employment over long-term social or educational integration. Denmark's 2016 ''Jobs first'' policy declared refugees as ''job

ready'' upon arrival, removing the preparatory phase seen in earlier human capital models and replacing it with immediate economic expectations.

In both cases, integration was no longer primarily about protection or social inclusion, it was about demonstrating economic value and behavioural compliance. This transformation reflects the construction of a new hegemonic articulation that linked ''labour'', ''self-sufficiency'' and ''cultural conformity'' into a chain of equivalence, collectively defining the conditions for belonging. Refugees were redefined from rights-holders to conditional participants – potential workers whose moral status depended on their utility. Through Laclau's perspective, Germany's integration policy sought to uphold a hybrid chain of equivalence blending support, inclusion and contribution - nonetheless it proved to be unstable. In contrast, Denmark had already established a robust hegemonic framework in which economic utility, self-sufficiency and cultural conformity were intricately interconnected.

Within Bauhn's framework, this shift in the integration approaches raises ethical concerns. Although it may be reasonable to promote autonomy through employment, connecting basic rights (such as permanent residency or access to benefits) to an individual's capacity to contribute economically risks damaging the inherent dignity of refugees. The burden of proof shifts onto the asylum seeker, who must now demonstrate worthiness. Additionally, Dauvergne's perspective is particularly evident in both cases since both states employed legal and institutional mechanisms to establish hierarchies of belonging. Access to rights and pathways to integration were increasingly stratified, benefiting those who could contribute over those who could not.

Repatriation

The final theme, concerning return and repatriation, reveals a substantial convergence between the two cases. Both countries gradually integrated repatriation and return as a central element within their asylum policies.

In Germany, this was evident through the passing of the Orderly Return Act and the creation of *Duldung* Light - a legal status that established indefinite precarity for individuals deemed uncooperative in their deportation process. These reforms increased detention powers, introduced new conditions for those under tolerated stay and normalised the concept of return as the default outcome. Germany's transition towards repatriation indicates a redefinition of the refugee as a symbol of failure or inadequacy,

no longer viewed as an individual to be integrated, but rather as one to be regulated and ultimately expelled. Here, Laclau's theory explains how new signifiers such as ‘’order’’, ‘’cooperation’’ and ‘’compliance’’ were chained together into a discourse that made exclusion appear technically necessary and ethically neutral.

Denmark’s approach was similar in intent but more direct. The shift toward temporary protection and the revocation of permanent residence rights, even for previously integrated refugees, represented a long-term strategy of restricting permanent settlement entirely. While Germany allowed for a more conditional inclusion based on performance, Denmark took a more direct approach making temporariness the norm. The 2019 "paradigm shift" under Act No.174 L140, clearly redefined refugee status as a temporary exception. Denmark essentially removed the promise of permanence when it rebranded integration benefits as the "Self-Sufficiency and Repatriation Programme". In Laclau’s terms, there was a rearticulation of the entire symbolic field - signifiers such as integration, which were formerly associated with belonging, were now emptied and re-invested with the logic of containment and return. The refugee became a transitional subject, framed not as a potential future citizen, but as a temporary obligation to be fulfilled.

Furthermore, within Bauhn’s ethical perspective, this shift represented a clear departure from the Comparable Cost Principle. The material and psychological repercussions of asylum seekers being held in a legal limbo, often for extended periods of time, significantly outweigh the administrative convenience achieved by the state. Rather than evaluating obligations proportionally, both states focused on deterrence and control. Also, within this phase, Dauvergne’s insights are perhaps the most evident. Migration law, in both cases, became a tool for reinforcing sovereign power, not just at the borders, but also in the lives of those already within. The grey zones created by statuses such as *Duldung* or Temporary protection enabled the states to manage through ambiguity, maintaining control without outright rejection or clear inclusion. This restructured the ethical foundations of refugee policy around sovereignty rather than solidarity.

Conclusion

The comparative analysis of Denmark and Germany's responses to the 2015 ‘’refugee crisis’’ reveals how ethical principles, while frequently mentioned, were constantly modified in accordance with evolving national interests, institutional capacity and political pressures. Although Germany initially emerged as a symbol of moral leadership through a temporary opening rooted in ethical universalism, it gradually adopted a more selective and conditional approach. Denmark, in contrast, maintained a consistently particularist stance, prioritising national cohesion and deterrence from the very start.

Across all three themes - Protection, Integration and Repatriation - both states revealed a progressive narrowing of inclusion, guided less by the inherent rights of refugees and more by their perceived utility and compliance. Humanitarian commitments were not abandoned but rearticulated through chains of equivalence that strongly linked belonging to utility, compliance and contribution. The refugee subject was thus redefined - not as a bearer of universal moral rights, but as a contingent presence to be governed, evaluated, and when necessary, excluded.

In the end, the Danish and German cases might reflect a broader European tendency, where the ethical foundations of refugee protection remain present, but are continuously reinterpreted in light of national concerns. Humanitarian commitments are not fixed or absolute - they are shaped by institutional structures, redefined through political discourse and often subordinated to the logic of control and manageability. What emerges is a persistent tension at the heart of refugee governance in liberal democracies - the challenge of upholding universal moral obligations in contexts where particular national priorities increasingly dominate.

Discussion

The discussion section addresses the final research question of this thesis – *Why do states prioritise national interests, such as political, economic and security factors, over humanitarian obligations?* – It explores why national interests tend to override humanitarian obligations in refugee policy, while also arguing that this prioritisation is not necessarily due to a lack of ethical concern, instead, it reflects a particular approach that prioritises the needs of the state's own citizens. Drawing on the theories of Per Bauhn (2019), Catherine Dauvergne (2004) and Ernesto Laclau (1992), this chapter argues that national interest often takes precedence over humanitarian concerns due to a combination of internal political pressures, economic constraints and the need for sovereign assertion.

National Interest as Ethical Particularism

As it was analysed in the previous chapter, the states did not operate outside ethical frameworks when prioritising national interests, instead they made use of a particularist moral reasoning, which prioritises obligations to their own citizens over universal humanitarian commitments. According to Bauhn (2019), particularism legitimises the balance of humanitarian obligations against the perceived needs of the national community, allowing states to justify restrictive asylum policies as ethical. From this perspective, measures aimed at preserving social cohesiveness, protecting public resources and ensuring economic stability are not necessarily unethical, but rather representations of a hierarchy that prioritises national citizens.

Denmark is a clear example of this ethical approach, its asylum and integration policies have long been shaped by deterrence strategies and a restrictive inclusion model that is designed to reduce the pull factors for asylum seekers considering applying for protection in Denmark (Gammeltoft-Hansen, 2017). The restrictive measures implemented during the 2015 ''refugee crisis'', such as the temporary protection status, stricter family reunification regulations and increased repatriation efforts did not necessarily represent a significant policy shift, they simply indicated the strengthening of a previously established trajectory which was already based on a particularist reasoning. This continuity demonstrates that national interest and ethical considerations are not necessarily opposed but are instead reconciled through a moral framework that justifies exclusion as a means of protecting national welfare.

In contrast to the Danish case, Germany's initial response to the 2015 ''refugee crisis'' was grounded in a universalist approach. Merkel's statement *"Wir schaffen das"* reflected a strong political and ethical commitment to humanitarian values, suggesting that Germany was willing to take responsibility that went beyond its national interest. This position represented not only a legal adherence to international obligations but also a normative choice to act according to an inclusive understanding of responsibility and moral duty beyond national borders. However, this universal and humanitarian approach proved to be politically fragile. The fast arrival of more than one million asylum seekers in 2015 induced a significant strain on Germany's public institutions and infrastructures. The federal states faced logistical challenges in housing and in the integration of large numbers of asylum seekers and ''the administrative actors on all levels of the federal system seemed temporarily overwhelmed with the tasks at hand'' (Koch et al., 2023, p.5).

These circumstances eventually triggered a broader political reaction – the rise of right-wing movements, especially the far-right party, Alternative für Deutschland (AfD) - which gained importance by capitalising on fears of disorder and uncontrolled migration. This situation aggravated with the events of New Years Eve 2015 in Cologne (which have been previously mentioned) where several women were sexually harassed by ''*dozens of groups of North African and Arab-looking men''*, including asylum seekers (Lemay, 2024, p.124; Deutsche Welle, 2016) this is often considered a ''crucial turning point'' (Koch et al., 2023, p.6). Widely covered by the media, these events contributed to the sense of loss of control that was mainly linked to the government's decision to keep its borders open in September of 2015. These events, along with a rise in terrorist attacks across Europe, contributed to a growing sense of insecurity. The AfD capitalized on this atmosphere to boost its political support, which was reflected in the increased participation in far-right protests and a rise in violent attacks targeting asylum seekers (Koch et al., 2023, p. 6). It is then fair to say, the growing polarisation in public opinion, which is reflected in the rise of protests, media narratives and electoral shifts (Lemay, 2024) – compelled the German government to adjust its position, which led to the series of legislative changes introduced from 2016 onwards, including the previously mentioned Asylum Packages I and II that reduced social benefits, restricted family reunification rights and tightened eligibility for protection.

These developments then marked a clear deviation from universalism toward a more particularist logic - one that placed national control and social stability at the center

of policy making. Although Germany did not withdraw from its formal commitments to refugee protection, its emphasis shifted from an ethics of openness to an ethics of conditionality, in practice, this meant that humanitarian obligations were reframed through national interest – the right to protection remained but its application became increasingly influenced by factors such as integration potential, labour market participation and of course, security compliance. Importantly, this shift was not simply a policy adjustment, it was a complete redefinition of ethical priorities – the state began to recalibrate its response in a way that allowed it to remain formally committed to international obligations while still reasserting sovereign and control. Therefore, Germany's trajectory demonstrates how fast a universalist approach may be overturned by domestic political dynamics, particularly when humanitarian intervention is deemed to be incompatible with national cohesion. In this sense, Germany's response during 2015 exposes how particularism may develop not just from longstanding policy traditions, as in the case of Denmark, but also from internal political rupture.

Sovereignty and the Reassertion of Control

The shift in how states approach humanitarian obligations can also be understood through Catherine Dauvergne's (2004) argument that migration law has become one of the few areas where states can still fully exercise their sovereignty in an increasingly globalized world. While many aspects of governance are influenced by international cooperation and cross-border regulations, refugee policy remains firmly in the hands of national domain. This gives states significant power to decide who can enter, under what conditions and what rights they have upon arrival. In this sense, prioritising national interests is not just a political decision, it serves as a way for governments to reaffirm their authority and protect their legitimacy.

In Denmark, this reassertion of sovereignty is reflected in a series of legal and policy changes. These adjustments have gradually made it more difficult for asylum seekers and refugees to access protection, as well as reducing their rights. The government has also used discretionary powers to shape integration policies according to national interests, sending a clear message that inclusion is not guaranteed. While Denmark still formally acknowledges its international obligations, the actual implementation of these commitments has become increasingly narrow and selective. The government reinforces

its control not by completely shutting its borders, but by making access to protection less meaningful in practice.

As mentioned extensively before, Germany initially had a more open and humanitarian response, however, the following year was marked by a significant policy shift with the introduction of Asylum Packages I and II which included, among other things, cuts to social support benefits and stricter family reunification rules. These changes aimed not only to reduce the number of incoming refugees but also to restore a sense of order, particularly after the government faced criticism for how it managed the ''crisis'', leading to a rise in far-right movements. Although Germany did not completely withdraw from its humanitarian responsibilities, it adjusted them to align better with domestic political pressures. This demonstrates that even the countries that begin from a universalist stance may revert to prioritising sovereignty once their legitimacy is at stake.

In both cases, Denmark and Germany, migration law became a key instrument through which the state reasserted its authority. Despite maintaining references to international standards and rights-based language, both nations used legal reforms and policy shifts to strengthen exclusion and regain control. The outcome is a form of ''managed humanitarianism'', where the appearance of commitment remains, but the reality is shaped by national priorities.

Managed Humanitarianism

Ernesto Laclau's theory (1992) on hegemony offers a useful way to understand how countries can shift from a focus on humanitarian ideals to prioritising national interests, all while still appearing to uphold their moral obligations. Laclau argues that concepts like ''protection'', ''solidarity'' and ''responsibility'' are not fixed in meaning – they are constantly redefined through political discourse. What matters is how these terms are used and framed in dominant narratives and which values or issues they are linked to through what Laclau calls *chains of equivalence*.

In Denmark, this reframing has unfolded over the years and became even more evident following the ''refugee crisis''. The notion of integration has transformed into a conditional arrangement, almost like a contract. Instead of welcoming refugees based on shared humanity, they are evaluated on their potential economic contribution and cultural fit. Integration in this context is closely tied to concepts like self-sufficiency, labour market participation and loyalty to Danish values. These elements form a chain of

equivalence that connects successful integration to productivity, national cohesion and social stability, rather than to rights, protection or equality. A notable example of this is the renaming of the integration programme to ‘’Self-Sufficiency and Repatriation Programme’’, which frames return and repatriation as a success story while making long-term residency feel like an exception.

Germany's journey, though different, has led to a similar conclusion. During the early stages of the 2015 ‘’refugee crisis’’, the initial discourse centred on solidarity, moral duty and historical responsibility. This perspective formed a universalist chain of equivalence that liked refugee protection to democracy, human rights and collective memory. However, this framing became increasingly unstable in the face of events like the Cologne attacks and the rise of far-right movements. A new discourse emerged, introducing terms like ‘’order’’ and ‘’control’’ into this chain, tying them to the notion of responsibility. This resulted in a new chain of equivalence that merged the ideas of humanity and order, allowing the government to implement more restrictive policies while still holding on to an ethical stance. Protection remained significant, but only under strict conditions that were aligned with national interests.

In both Denmark and Germany, Laclau’s theory offers insight into how changes in discourse can reshape policies without outright rejecting international standards. By reinterpreting the meanings of solidarity and responsibility and linking them to different political goals, the states are able to justify a shift towards particularism while still claiming to follow ethical principles.

Explaining the Prioritisation of National Interest

When we consider the findings exposed above and reflect on how the countries approach their refugee policies, it becomes evident that national interest usually takes the lead, often overshadowing humanitarian needs. Three main factors might contribute to this tendency: the quest for political legitimacy, economic and institutional capacities, and the desire to assert state sovereignty. These elements are interconnected and reinforce one another in shaping how refugee policy is constructed and justified.

Political Legitimacy and Social Stability

In liberal democracies, maintaining public trust is crucial. How a country handles its refugee policy can significantly affect this trust. For instance, Germany's initial open-hearted response to the ''refugee crisis'' in 2015 reflected strong humanitarian values. However, this approach faced intense public scrutiny, especially amid security concerns and the rise of right-wing movements. Events like the Cologne New Year's Eve incidents heightened fears and anxieties, fuelling a sense of crisis which was politically exploited by actors like the AfD. In response to mounting public pressure, the German government shifted to more restrictive policies in order to restore faith in its ability to manage the situation. Meanwhile, Denmark had a distinct experience, as its long-standing focus on deterrence had already institutionalized a framework of ethical particularism, which might have allowed the state to continue to employ this particular approach with minimal resistance, thereby further reinforcing its already established particularist stance.

Economic and Institutional Constraints

When it comes to refugee protection, governments often adopt a pragmatic, cost-benefit perspective. They emphasise the financial and social implications of accepting large numbers of asylum seekers. Both Germany and Denmark tied successful integration to economic performance, making access to rights dependent on factors like employment and self-sufficiency. This trend reflects a broader shift toward economic pragmatism, where humanitarian obligations take a back seat to economic and labour market considerations. Instead of expanding their responsibilities out of a sense of international solidarity, states used arguments about fairness and sustainability to justify limiting access to protection and integration. Concerns that welfare systems could become overloaded are not just practical challenges, they also serve as political tools to advocate for more restrictive measures.

Sovereignty and Control

As Catherine Dauvergne argues, migration law is one of the few areas where states can still maintain significant control. In both Denmark and Germany, refugee policy was often used as a way to reinforce national authority over borders and the criteria for inclusion. In Denmark, the implementation of various amendments and reforms to refugee policy, and the use of symbolic measures, such as the ''Jewerly law'', highlight its firm stance on state control. Germany, after its initial open policy, also began tightening its

regulations through legislative changes that aimed at regaining control and addressing the public concerns about state authority.

When we look at these three dimensions together, it becomes clear that the prioritisation of national interests does not mean that ethics are entirely disregarded. Instead, states often reinterpret values like responsibility, solidarity and fairness to align with domestic political necessities. Governments increasingly reshape international norms to fit their narratives, pressures and capacities. This creates a form of ethical particularism where they maintain a sense of moral integrity while significantly narrowing the paths for humanitarian protection. In essence, while countries may express commitment to humanitarian ideals, the reality of refugee policy often reveals a complex interplay of motivations driven by political, economic and sovereignty considerations.

In conclusion, this section has revealed that states prioritise national interests over humanitarian obligations not due to an outright rejection of ethical considerations, but because of the way ethical responsibility is reinterpreted through the lens of particularism. As verified in both cases, national interest becomes ethically justifiable when framed as a moral duty toward citizens, especially in the context of maintaining political legitimacy, managing economic capacity and asserting sovereign control. Denmark is a clear example of how a longstanding particularist alignment can normalise restrictive asylum measures. While Germany, on the other hand, shows how even an initial commitment to universal humanitarianism can be rapidly reshaped by internal political pressures, resulting in policies that increasingly prioritise control and conditionality. These examples highlight a key idea: prioritising national interests is not just a practical choice; it might also be based on an ethical view that focuses on the state's own values and necessities. So, when we look at how states handle humanitarian obligations, we see they do not simply discard them, instead, they adapt these obligations to align with their national narratives and political needs. By using ethical particularism, assertions of sovereign authority and strategic discourse, they justify policies that serve their domestic goals, often at the expense of broader humanitarian commitments.

Ethical Particularism and the Future of Refugee Protection in Europe

It is important to acknowledge that the findings discussed in this chapter might have important implications for the future of refugee protection in Europe. As ethical

particularism increasingly takes root in national asylum systems, we might face a risk to the strengthening of humanitarian values - not through outright rejection, but through a slow and subtle reinterpretation. When states start to adjust universal principles like solidarity and protection to align with their own interests, it might suggest that the humanitarian framework laid out in official documents such as the 1951 Refugee Convention may be losing its influence. This raises crucial questions about the sustainability of international refugee protection. If national interests continue to overshadow humanitarian considerations, we may find ourselves compromising on the very values that guide our treatment of refugees. The normalization of ethical particularism, especially in liberal democracies, indicates a shift in how we perceive and enact humanitarianism. This change could have long-lasting effects on the rights and status of refugees in Europe, highlighting the need for careful reflection on our commitment to their protection and dignity.

Furthermore, the rise of ethical particularism in refugee governance raises important questions about its role as a potential new hegemonic discourse. In Denmark, and Germany, ethical arguments that prioritise national interests became not only normalised but also ethically justified in political debates. This suggests that ethical particularism may be emerging as a new hegemonic logic – one that redefines the boundaries of moral responsibilities around national belonging. Far-right movements might have played a significant role in bringing these ideas into the mainstream, often framing their arguments around protecting cultural identity, security and national cohesion. However, this shift toward particularism might not only be driven by the rise of far-right. It could be argued that parts of the civil society could have also, either explicitly or implicitly, contributed to the reinforcing of this framing by focusing on the perceived limits of solidarity. While some civil society actors may continue to push back against exclusionary practices, others might engage with ‘’pragmatic’’ narratives, potentially contributing to the embedding and normalisation of ethical particularism within the wider political landscape. This situation raises a crucial question: Has ethical particularism evolved from merely being a political stance to becoming the dominant common sense in national discussions about migration?

Moreover, it is important to discuss how ethical particularism might also help reshape how solidarity and responsibility are understood within a national context. Within the European Union context, these concepts are typically associated with collective action

and a shared sense of moral duty. However, in Denmark and Germany, the shift toward ethical particularism might have contributed to a redefinition of these concepts. Solidarity was increasingly directed inward, either towards national citizens or to ''deserving'' refugees who could contribute positively and integrate. While responsibility was reframed as an obligation that primarily lies with the states towards their own citizens. This shift raises important questions about the future of asylum systems in Europe. Instead of promoting a sense of shared responsibility that spans across borders, ethical particularism seems to develop a hierarchy where some individuals are considered more deserving of protection than others. This transformation requires a serious reflection on whether solidarity in Europe is still understood as a transnational value or if it has become limited by national interests and political agendas.

Another important element to reflect on is the growing influence of economic pragmatism in the evolution of ethical particularism. It is fair to say that economic pragmatism does not replace ethical particularism as an approach, it redefines it, aligning moral obligations more closely with national interests. In both Denmark and Germany, the legitimacy of asylum and integration policies became increasingly connected to economic performance and labour market participation. Inclusion was no longer granted solely on the basis of vulnerability and protection, but in the ability to contribute economically and to be self-sufficient. This type of approach might contribute to a selective form of solidarity – where refugees and asylum seekers are viewed as worthy of support and protection, only if they play a positive role in the country's economy. This approach could reinforce a framing of integration as a transactional agreement instead of a matter of justice and humanitarian commitment. Therefore, these developments might raise difficult questions about whether solidarity is being conditioned on the ability to contribute to the host society and whether this approach still respects the core values behind asylum protection in the first place. If solidarity is being redefined through the lens of economic worthiness, then we risk changing the very foundation of how we protect refugees. This type of shift might suggest a significant transformation in how we manage asylum, moving away from a shared sense of humanity and towards a focus on measurable utility. It raises significant questions not only about the inclusiveness of national policies but also about the integrity of the entire humanitarian framework. We need to consider whether asylum remains a universal obligation, or if it is slowly being redefined as a privilege that must be earned through economic contributions.

Conclusion

This thesis explored how ethical principles influence refugee integration policies, particularly in the context of the tension between universal humanitarian obligations and particular national interests. By examining the cases of Denmark and Germany during the 2015 ‘’refugee crisis’’, it was demonstrated that while ethical considerations play a role in shaping refugee policies, they are frequently reframed to serve domestic political and economic agendas.

Central to this research was the concept of Ethical Particularism, which in this thesis was conceptualised not only as a normative position where states prioritise their own community but also as a flexible ethical logic that allows states to adapt and reframe universal values - such as solidarity, protection and responsibility - to align with evolving national priorities. Drawing on Per Bauhn’s ethical theory and complemented by Laclau’s discourse theory and Dauvergne’s theory on sovereignty, ethical particularism was understood here as both an ethical reasoning and a strategic political tool used to justify restrictive and conditional policies while still maintaining claims to ethical legitimacy.

Through the lens of Per Bauhn’s ethical framework, the analysis indicated that both Denmark and Germany engaged in particularist ethical reasoning to justify their restrictive policies. Denmark exemplified a consistent trajectory of ethical particularism, prioritising national obligations over universal humanitarian commitments. Its strategies - characterized by deterrence, conditional integration and eventual repatriation - were not merely responses to the ‘’refugee crisis’’, they reflected a long-standing emphasis on national sovereignty and cohesion. Bauhn’s Comparable Cost and Fair Share principles emphasised the ethical limitations of this approach, especially in light of Denmark’s capacity to provide protection. In contrast, Germany initially adopted a universalist position. This stance was rooted in a normative commitment to human rights and solidarity. However, this position proved politically unstable - the rapid influx of refugees, combined with media-driven anxieties and the rise of far-right narratives, led to a shift towards conditionality. This transition reflected a growing emphasis on political legitimacy and social stability, resulting in a redefinition of ethical priorities that increasingly favoured labour market participation and stricter border controls. Although

Germany did not entirely abandon its humanitarian responsibilities, this case illustrates how universalist ethics can be easily reshaped under internal pressures.

Employing Ernesto Laclau's discourse theory revealed that ethical principles such as ''solidarity'' and ''responsibility'' are fluid and subject to reinterpretation through political discourse. In both Denmark and Germany, humanitarian values were rearticulated in ways that aligned with national interests. Examples include Denmark's ''Self-Sufficiency and Repatriation Programme'' and Germany's focus on ''return'' in its post-2017 policies, which illustrated how ethical claims were leveraged to justify exclusionary or conditional policies while maintaining a sense of adherence to international norms. These discursive shifts enabled the legitimisation of particularist approaches while apparently upholding moral values. Furthermore, Catherine Dauvergne's theory on sovereignty highlighted migration law as one of the last domains where states can assert control, this was evident in both cases' approach. In both Denmark and Germany, sovereignty was exercised through legal amendments, policy reforms and symbolic actions intended to restore national control and delineate the boundaries of inclusion. Even when legal frameworks conformed with international obligations, their practical implementation often limited protection and redefined the presence of refugees as conditional or temporary.

To address the primary research question, this thesis has demonstrated that ethical principles indeed shape refugee integration policies, although not in their original universalist form. Instead, these principles are continuously negotiated and reframed to align with domestic agendas. States engage with ethical reasoning not as detached entities but as actors that adapt such reasoning to legitimise decisions prioritising national interest. Consequently, ethical particularism becomes the prevailing logic, enabling governments to project a façade of moral responsibility while narrowing the scope of protection. Regarding the second research question, concerning the reflection of these tensions in Denmark and Germany, the analysis revealed two distinct yet converging paths. Denmark consistently adhered to a particularist logic rooted in deterrence and conditionality. In contrast, Germany started with a universalist framework, which shifted towards particularism due to political ruptures and public backlash. These case studies illustrate the context-dependent nature of ethical reasoning, influenced by internal dynamics such as party politics, media narratives and public opinion.

Finally, the discussion identified three main factors explaining why states might prioritise national interests over humanitarian obligations: the quest for political legitimacy, the constraints of economic and institutional capacities and the strategic assertion of sovereignty. Collectively, these factors elucidate how and why refugee integration policies are shaped more by pragmatic concerns than by moral ideals, even when articulated within an ethical discourse.

Building on these insights, future research could expand this analysis to the European Union level. Exploring how ethical particularism manifests within EU decision-making – such as in negotiations related to the New Pact on Migration and Asylum or in the allocation mechanisms of the Common European Asylum System – would help determine whether the patterns observed in Denmark and Germany are unique or part of a broader supranational trend. Comparative studies across various member states, or an in-depth investigation of EU institutions, could also shed light on how concepts of solidarity and responsibility are evolving beyond national boundaries and what implications this has for the sustainability of a shared humanitarian framework across Europe.

In conclusion, this thesis contributes to an enhanced understanding of the ethical dilemmas that are present in refugee integration. While international norms maintain significance, their application is often limited by how states interpret and implement those norms. The challenge moving forward lies not only in reaffirming humanitarian commitments but also in critically confronting the complex national realities that continue to reshape them.

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