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Imported Criminalisation: The Kurdish Diaspora after Sweden and Finland's Accession to NATO

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Abstract

This article introduces the concept of 'imported criminalisation' within the broader context of diaspora-related conflicts. 'Criminalisation' refers to repressive political measures targeting a group, such as an ethnic minority, through legal means. 'Imported criminalisation' occurs when a host country adopts the securitisation and criminalisation standards of the country of origin against a diaspora. By examining the Trilateral Memorandum between Turkey, Sweden, and Finland regarding NATO accession, the article explores its impact on the Kurdish diaspora in the Nordic countries. Imported criminalisation, as a part of conflict transportation and transnational repression, affects the host society by altering legal standards and creating a grey area of discretionary judgement, fostering uncertainty and fear. The article also discusses some of the negative impacts of the Memorandum on Swedish and Finnish societies and their responses, before reviewing the main changes in the Kurdish diaspora's mobilisation in the two countries.

Keywords

Kurdish diaspora, imported conflict, criminalisation, Turkey, Sweden, transnational repression

Introduction

On 24 February 2022, Russia launched its aggression against Ukraine, triggering a major geopolitical shift as most NATO members supported Kyiv. Turkey, however, adopted an ambivalent position, refraining from endorsing many Western sanctions while mediating negotiations between the belligerents. Although NATO enlargement remains central to the conflict, Russia's invasion prompted Finland and Sweden – longstanding neutral states – to seek membership. Ankara used their accession bids to press demands on anti-terrorism measures and the treatment of Turkish dissidents and Kurdish groups, whom it designates as terrorists. President Erdoğan labelled the Nordic countries "guesthouses for terrorist organisations" (Toksabay and Lehto 2022), signalling a potential veto under NATO's unanimity rule. Thus, the Turkish-Kurdish conflict became entangled with wider

geopolitics, illustrating both Ankara's diplomatic leverage and the importance of diasporas in security policy (Aggestam, Schierenbeck, and Wackenhut 2023; Gunter 2022b).

In this article, I will focus on the impact that anti-terrorism agreements between European countries and Turkey have on the Kurdish diaspora, positioning my contribution into the broader debate on the role of diasporas in global politics. The article introduces the concept of imported criminalisation: a process in which society becomes entangled in diaspora-related conflicts through the creation of a grey zone of discretionary judgment, which fosters fear by blurring the boundaries between permissible and illegal activities.

I will first discuss the literature on diasporas and imported conflicts, bridging it with the scholarship on terror-linked securitisation and transnational repression. Then, through speculative analysis of the Trilateral Memorandum between Finland, Sweden, and Turkey regarding NATO membership, I will illustrate the emergence of what I term the 'imported criminalisation' as a component of the broader importation of conflicts. Lastly, I will scrutinise host societies' reactions and the Memorandum's impact on Kurdish activism. The data are mainly collected through desk-based research on secondary sources, such as media reports and news articles, and reinforced by remote interviews with key informants – including Kurdish members of the diaspora, spokespersons of Kurdish associations in Sweden, activists, journalists, and lawyers. All interviewees gave their informed consent and have been anonymised accordingly, except for politicians who agreed not to be anonymised. This qualitative approach seeks to explore a new field of inquiry – imported criminalisation – focusing on subjective perceptions and experiences, rather than attempting to provide a comprehensive account of the phenomenon's prevalence.

Diasporas and Imported Conflicts

The Kurdish diaspora in Europe is mostly conflict-generated. Although the first wave of migration concerned guest workers, especially in Germany, after the coups in 1971 and 1980 in Turkey, the Kurds began migrating for political reasons, to flee repression, persecution and the low-intensity civil war between the Turkish state and the Kurdistan Workers' Party (PKK) (Başer 2013b). In Sweden and Finland, the Kurdish diaspora has grown since the 1990s, especially in Sweden, where it has become the third-largest Kurdish presence in Europe (Ata 2023). The asylum seekers who came to Europe in the 1990s brought along the conflict from Turkey (Başer 2011), and recently from Syria and Iraq, after the rise of the Islamic State (ISIS) and the eruption of the Syrian civil war.

A minimal definition of diaspora can be that of a population, or at least a segment of it, living outside its homeland but characterised by an active interest in it (Brubaker 2005; Connor 1986; Vertovec

2009). The expression ‘conflict-generated diaspora’ refers to “networks of those forced across borders by conflict or repression” (Lyons 2007, 530). Both these definitions tend to essentialise diasporas, framed as byproducts of processes out of their control, rather than as an active part of their diasporic identity formation process (Féron 2022). Nonetheless, this terminology captures the key ties between the diaspora and the fact that its members have experienced, directly or indirectly, the harshness of war and/or political repression.

Conflict studies often focus on conflict-generated diasporas’ roles in escalation or de-escalation in their homelands, framing them as either peacemakers or peace-wreckers (Smith and Stares 2007). Smith (2007) argued that diasporas do not display any predetermined pattern of intervention, as their ability, chances, and motivations to engage may vary greatly across groups. Nonetheless, Toivanen and Başer (2020) proposed a matrix of diaspora activism types across four phases of peace and conflict: ‘ongoing conflict’, ‘peace processes’, ‘post-conflict reconstruction and development’, and ‘transitional justice’. The form, intensity, and impact of diasporas’ engagement depend not only on their internal dynamics but also on the political contexts of both host and home countries.

What remains central is that conflict-generated diasporas are prone to bringing some forms of conflict from the country of origin to the host country. Members of rival groups may migrate to the same state or support one side from abroad. The literature describes these configurations through the concepts of de-territorialisation (Rabinowitz 2000), re-territorialisation of conflict (Carter 2005), conflict importation (Başer 2013a), and conflict transportation (Féron 2017). Although contiguous, these terms have distinct meanings. Féron (2017, 363) initially regarded conflict importation and transportation as “interchangeable”, referring to situations where conflict continues – discursively, symbolically, and materially – in the host country, creating tensions within or between states. Later, however, she refined her analysis, distinguishing the four categories and arguing that “they put the stress on diverging explanations, and on different actors, for conflicts occurring in diaspora settings” (Féron 2022, 296).

Féron establishes an analytical correlation between conflict importation and de-territorialisation, and between conflict transportation and re-territorialisation. In the first case, “the process through which a conflict is imported and spreads to host countries [...] allows conflicts to become de-territorialised, that is to become partly disconnected from the core territory on which they are taking place” (Féron 2022, 296). In the second case, the concepts of conflict transportation and re-territorialisation “pertain to processes whereby de-territorialised conflicts take root and occur in other territories and spaces” (Féron 2022, 296). In other words, importation and de-territorialisation focus on how homeland conflicts extend into the diaspora context, while transportation and re-territorialisation capture how

such conflicts develop new dynamics through different actors and discourses in new settings (Féron and Başer 2023a).

These distinctions are analytically useful but often overlap. Re-territorialisation does not exclude the persistence of de-territorialising dynamics. Conflicts may continue to unfold transnationally, including in cyberspace (Brinkerhoff 2009), and develop autonomous characteristics within specific host countries – what Féron (2013; 2017; 2022) terms the autonomisation of diaspora-related conflicts.

The aforementioned four categories should suggest that, from the perspective of the diaspora, both endogenous and exogenous elements exist in generating conflict transportation. Diasporas are active in shaping ideas and emotions towards the (imagined) homeland (Cohen 2007), and the perception of what a homeland is may even change over decades (Morawska 2011). Consequently, conflict situations may arise in the host country because of the diasporas' activities. A diasporic group may pressure the receiving state's government to take some form of action, which is perceived as hostile by another group or country. In this case, the literature on conflict transportation meets that on transnational repression, which focuses on how diasporic groups "remain subject to repression's deterrent effects *after* emigration" (Moss 2016, 481).

For example, Turkey asked the US government to hand over Fetullah Gülen, a Turkish preacher residing in Pennsylvania, whom Recep Tayyip Erdoğan accused of being the leader of an organisation hostile to him and responsible for the attempted coup on 15 July 2016. The US denied the extradition, exacerbating diplomatic tensions. Another situation may involve two opposing diasporic groups migrating to the same country, reenacting the homeland conflict in the host country, as with Turkish and Kurdish diasporas in Germany and other European countries (Başer 2013a; 2015). Furthermore, some events may even generate a conflict between two diasporic groups previously at peace, as the war in Ukraine demonstrated (Voytiv 2019).

The literature on transnational repression highlights that authoritarian states extend their coercive power beyond national borders to intimidate and control their diaspora and dissidents abroad (Dukalskis et al. 2022; Anstis, Al-Jizawi, and Deibert 2023). This repression includes physical violence, such as assassinations, but also non-physical means like property confiscation, withdrawal of citizenship, proxy threats, manipulation of international institutions like INTERPOL, and increasingly, the use of Internet Communication Technologies (ICTs) (Moss 2016; Moss, Michaelsen, and Kennedy 2022; Glasius 2018). ICTs enable authoritarian regimes to exercise social control and domination remotely through surveillance, harassment, and disruption of communication (Moss 2018; Michaelsen 2018; Oztig and Karluk 2024). Transnational repression is thus theorised

not just as repressive acts but as constituting and configuring new socio-spatial dynamics where affected individuals internalise notions of constant surveillance and control.

Shifting away from a linear causality and focusing on the multiplicity of involved actors is fundamental to making sense of diaspora-related conflicts (*Ardevini and Başer, in this special issue*). Féron and Başer suggest framing these combinations of relations as “*configurations* in which actors such as diasporas themselves, institutions or individuals in host and home countries, as well as transnational actors, can all play a decisive role” (Féron and Başer 2023a, 377). Diasporas, as actors operating in transnational spaces, might merge with other networks, forging their actorness in a web of political alliances (Ventura 2023). The growing interests of both sending and receiving states in homeland policies further complicate the overall picture (Başer and Féron 2022; Başer and Öztürk 2020; McIntyre and Gamlen 2019).

Thus, we are witnessing a twofold development. On the one hand, there is an increasing autonomisation of conflict transportation. Actors, dynamics, and spaces are defined more by the local context than the homeland. Although the conflict is carried on mostly through symbolic and discursive tactics, material violence does occur, especially when opposing diasporic groups live in the same city (Féron 2017). On the other hand, state power is extending its reach beyond national borders to affect diaspora communities. States now actively target diasporic dissidents with extraterritorial repression (Öztürk and Taş 2020), employing strategies like abduction, confiscation, surveillance, and intimidation of relatives in the home country (Tsourapas 2021, 618). Öztürk and Taş (2020) identified two dimensions of state extraterritorial expansion in regimes like Turkey: vertical, involving state-employed actors (intelligence services, GONGOs, think tanks, pro-government diaspora groups), and horizontal, involving tactics such as abduction, violence, surveillance, propaganda, and intimidation. These actions target diasporic groups within host states, prompting host countries to deploy counter-strategies to assert sovereignty and limit the sending state’s influence (Başer and Féron 2022).

Conflict transportation is therefore an increasingly complex phenomenon, where home states consider diasporas as targets of both soft power and repression (Başer and Öztürk 2020; McIntyre and Gamlen 2019), and where dynamics multiply across generations (Başer 2014; Lefort 2023), internal fractures (Féron and Başer 2023b), and new digital technologies that amplify narratives and the visibility of conflict (Chernobrov 2022; Svop Jensen 2023). In the next section, I will focus on the discursive dimension of states’ repression of diasporas, often framed within counter-terrorist policies and narratives.

Terror-Linked Securitisation of Diasporas

Academic and political interest in the role of diasporas in peace and conflict is relatively recent and intensified after 9/11 and the ‘War on Terror’, especially in the United States and among its allies (Cochrane 2015; Faist 2002). European and American political imaginaries were soon dominated by the fear of the homegrown terrorist and of an Islamic invasion, reinforcing the link between security and migration (Faist 2002). In this context, migrants were portrayed as threats to national security, values, and labour markets, while framing security in terms of the ‘homeland’ deepened the divide with immigrant communities (Cochrane 2015; Kaplan 2003). At the same time, the Islamic origins of the 9/11 attacks consolidated the idea of ‘Islamic terrorism’ as the global paradigm, fuelling widespread Islamophobia that conflated Islam and terror, despite evidence showing that Islamist groups mostly targeted other Muslims and Muslim-majority countries (Çavuşoğlu 2020). Since then, the focus has shifted from host-states’ suspicion toward diasporas – viewed as potential terrorist threats – to the transnational repression activities carried out by home-states against dissident diasporas, likewise accused of terrorism (Cordell and Medhi 2024; Dukalskis et al. 2022; 2024; Furstenberg, Lemon, and Heathershaw 2021; Tsourapas 2021). Investigating how democratic host-states’ discourses on the terrorist figure became tools for diaspora-origin countries to target communities abroad reveals transnational processes of securitisation and criminalisation of diasporas engaged in conflict transportation (*Féron and Başer, in this special issue*).

Criminalisation refers to political and narrative strategies that target specific groups, such as political movements or ethnic minorities, through legal systems and repressive measures (Eichler and Barnier-Khawam 2021). Criminalisation should be understood as an extension of a broader process of securitisation. The latter is defined as the narrative process that turns someone or something into a security matter, as illustrated by the Copenhagen School (Buzan, Wæver, and de Wilde 1998). According to Wæver (2009), three elements appear in securitisation discourses. The first is the identification of an existential, possibly imminent threat. The second involves the placement of the existential threat as the justification for special, often repressive, measures to safeguard a group, organisation, or state. Finally, the third element involves the discursive emergency call, in which the threat is used to demand an urgent, typically restrictive, response from authorities. From a securitisation perspective, criminalisation represents a phase of this broader strategy of invoking an emergency to justify special measures.

The label ‘terrorist’ serves as a critical justification for extraordinary repressive measures. Through repeated securitisation and demonisation, the ‘terrorist’ becomes the ultimate enemy (Puar and Rai 2002), warranting a state of exception and urgency driven by fear (Elden 2007). As Çavuşoğlu (2020)

notes, ‘terrorism’ has become a political weapon enabling security measures to serve hegemonic purposes. This extends beyond the US and its allies, as many inter-ethnic and political conflicts are framed as anti-terrorism, allowing governments to treat opponents as criminals rather than political actors. This approach, epitomised by British Prime Minister Margaret Thatcher’s denial of political status to Provisional IRA prisoners, framed terrorism solely as criminal violence, excluding political dimensions (McEvoy, McConnachie, and Jamieson 2007). While the Northern Irish conflict was eventually resolved politically, post-9/11 policies cemented Thatcher’s stance as dominant, enabling governments to justify military repression as counter-terrorism. Accusations of terrorism thus became tools of political delegitimation, criminalising dissent and political struggle.

Generated in democratic host societies, this narrative strategy now forms part of authoritarian and semi-authoritarian states’ repressive repertoires. Dukalskis et al. (2024) note that intensified domestic repression often extends transnationally, as dissidents flee abroad and are targeted as threats by home-state authorities. International connections between dissidents and diasporas further exacerbate these perceptions. States with extensive diplomatic networks are particularly adept at conducting transnational repression.

Turkey exemplifies how securitisation and criminalisation narratives have shifted from democratic to semi-authoritarian contexts. Turkish authorities employ these narratives to impose broad definitions of terrorism, leveraging the psychological and security effects of the ‘terrorist’ stigma (Casier 2019). Notably, the 9/11 aftermath saw the PKK added to the European Union (EU) and US lists of international terrorist organisations (Casier 2010). However, Turkey’s political use of ‘terrorism’ remains deeply problematic. Anti-terror laws and accusations of PKK support have been used to remove 62 of 68 democratically elected mayors¹, imprison numerous parliamentarians from the pro-Kurdish People’s Democratic Party, and jail more journalists than any other country (Gunter 2022a; Middle East Eye 2024). On 11 January 2016, 1128 academics in Turkey and abroad signed a petition urging an end to state violence in Kurdish-populated areas under curfew since 2015. In response, President Erdoğan accused the signatories of treason and terrorist propaganda, framing the crackdown on academic freedom as counter-terrorism (Başer, Akgönül, and Öztürk 2017). In other words, dissent itself is treated as terrorism (Eccarius-Kelly 2019).

In recent decades, Turkey has emerged as a major actor in domestic and transnational repression, employing terror-linked securitising and criminalising narratives. According to Freedom House, Turkey ranks as the world’s second most prolific perpetrator of transnational repression, with 132 incidents – 15% of the global total – of direct physical transnational repression since 2014

¹ The number is subject to variations, as new removals have occurred while writing.

(Gorokhovskaia, Schenkan, and Vaughan 2023). A recent journalistic report documented that Turkey's methods mirror US post-9/11 counter-terrorism efforts, including renditions, secret detentions, and torture (Miller 2024).

These theoretical and empirical considerations provide the foundation for analysing the Trilateral Memorandum between Turkey, Sweden, and Finland regarding the two Nordic countries' NATO accession. This Memorandum illustrates how conflict transportation, transnational repression, and terror-linked securitisation interweave, leading to the criminalisation of Kurdish diasporas in Sweden and Finland. Essentially, Turkey's demands for NATO membership approval required implementing laws and rules that criminalised previously permissible activities, primarily targeting Kurdish communities and Turkish dissidents.

The Trilateral Memorandum and Imported Criminalisation

On 28 June 2022, on the sidelines of the NATO summit in Madrid, the Foreign Ministers of Turkey, Finland, and Sweden signed the so-called Trilateral Memorandum² under the auspices of NATO's Secretary General. With this agreement, the two Nordic countries agreed to fulfil Turkey's demands to gain access to the Alliance. These points are of interest because they primarily concern the fate of certain Kurdish organisations and individuals in the two countries seeking accession. This section examines the relevant aspects, focusing on defining terrorist threats and counter-terrorist measures.

Point 2 of the Memorandum emphasises that, alongside mutual collective defence, the allies share common values. It highlights that a key NATO principle is solidarity in combating terrorism "in all its forms and manifestations", as a threat to both national security and international peace. Consequently, in Point 4, Finland and Sweden are asked to fully support Turkey against threats to its security. Specifically, they must not support organisations linked to Fetullah Gülen or the Kurdish YPG/PYD in Syria. The YPG, or People's Protection Units, acts as the Kurdish army in Syria, while the PYD, the Democratic Union Party, is the main Kurdish party, allied with the PKK. The two Nordic countries must also condemn terrorism and show solidarity with Turkey and its victims.

In Point 5, Sweden and Finland reaffirm that the PKK is a banned terrorist organisation and pledge to prevent any related activities within their borders. This includes not only the PKK but also individuals remotely connected to it. Additionally, the Memorandum states that "Finland and Sweden reject the goals of these terrorist organisations". This opposes not only their means but also their

² The document can be found on the official NATO website, at this link:
https://www.nato.int/nato_static_fl2014/assets/pdf/2022/6/pdf/220628-trilat-memo.pdf.

political objectives, reflecting an evolution of the Thatcherian idea that ‘there is no political violence’, now extended to deny any legitimate political goal associated with organisations labelled as terrorists.

To ensure compliance, Point 6 commits Sweden and Finland to amending their anti-terrorism laws, expanding definitions, and strengthening repressive measures. Finland separately classified public incitement related to terrorist offences as a distinct crime.

Point 7 concerns lifting the arms embargo imposed on Turkey after its military offensive against the Kurds in Syria. Point 8 outlines cooperation mechanisms among the three signatories, including intelligence sharing and dialogue across government levels. Sweden and Finland commit to combating terrorism and strengthening legislation. A crucial clause stipulates that they will deport suspected terrorists to Turkey based on Turkish intelligence, creating a bilateral legal framework for extradition. They will also investigate and prohibit activities linked to the financing or recruitment of the PKK or related organisations. The three countries thus pledge to combat disinformation and ensure that national laws are not used to promote terrorism or incite violence against Turkey. Point 9 establishes a Permanent Joint Mechanism involving experts from the Ministries of Foreign Affairs, Interior, Justice, Intelligence, and Security.

With this Memorandum, Finland and Sweden moved closer to NATO membership. Finland’s accession was approved on 4 April 2023, but Turkey demanded further assurances from Sweden. Bilateral relations had deteriorated over the previous decade, with Ankara accusing Stockholm of serving as a safe haven for Kurdish terrorists and opponents of Turkey’s ruling AKP (Justice and Development Party). However, Sweden carefully tried to balance the role of a friend and a severe critic (Aggestam, Schierenbeck, and Wackenhut 2023).

Relations worsened as the AKP grew more authoritarian, harming Turkey’s Kurdish minority. Kurdish issues also became contentious in Iraq and Syria, where Sweden criticised Turkey’s military operations. This dispute extended to NATO, as members such as the US and Germany viewed the Syrian Kurds as key allies against ISIS, while Turkey regarded them as a PKK offshoot and a national threat. This divergence strongly influenced Sweden’s difficult NATO accession (Aggestam, Schierenbeck, and Wackenhut 2023).

While the PYD and YPG received Western backing against ISIS, the PKK’s terrorist designation remains contested. In 2020, Belgium’s Court of Cassation ruled that the PKK should not be classified as a terrorist organisation, and calls for delisting have continued (Gunter 2022a). Finland’s President Sauli Niinistö clarified that the Memorandum did not label the YPG as terrorists, stressing that for Finland and Sweden they are not (Sutinen 2022). He added that the deal would bring no major

changes. Similarly, Gunter (2022b) argued that Kurdish interests were unlikely to be seriously harmed and urged the Kurds not to overreact to preserve relations with supportive governments.

Sweden completed ratification only on 7 March 2024, a year after Finland, as Turkey demanded proof of compliance. Statements by Sweden's prime minister, who did not exclude deportations of Kurds to Turkey, failed to satisfy Ankara (The Local 2022). Sweden subsequently introduced measures to appease Turkish concerns, resulting in unprecedented repression of its Kurdish community. Although few asylum seekers were deported, the overall atmosphere changed markedly.

Authorities pledged to strengthen counter-terrorism without undermining human rights, yet Kurdish organisations reported growing restrictions. Members of the diaspora and the Kurdistan National Congress (KNK) were banned from displaying certain flags during Newroz celebrations. The Kurdish Red Crescent closed its Swedish office after its bank account was frozen; international transactions linked to Kurdish groups faced tighter scrutiny, and police inspections became more frequent.

A general securitisation of the Kurdish community emerged in both Nordic countries, pushing previously lawful activities into a grey legal zone. While Swedish officials claimed that anti-terror amendments predated the Turkish deal, the impact was visible. On 1 January 2024, *Sveriges Radio* suspended Kurdish-language programmes, citing cost-cutting. Syrian Kurdish leaders, once welcomed in Stockholm, are no longer received, and many Kurds now fear speaking openly. Turkish authorities demanded the extradition of Kurdish exiles, including an Iranian Kurdish woman and a former Swedish MP with no legal ties to Turkey (Broomfield 2023).

What is at stake is the importation of Turkey's criminalising discourse towards the Kurdish community. I therefore use the term 'imported criminalisation' to describe the process whereby a host state applies securitising and criminalising practices toward a diaspora in accordance with the origin country's standards and political will, within the broader context of imported conflict and transnational repression. The Trilateral Memorandum exemplifies this, as its implementation has pushed many individuals and organisations to the edge of legality, along with those cooperating with them.

In the next section, I will outline the contours of imported criminalisation in the field of the Kurdish diaspora and the response of Swedish and Finnish societies. I will then sketch a picture of Kurdish diaspora mobilisation in the two countries, before and after the Memorandum.

The Negative Consequences of Imported Criminalisation

By defining the criminalisation of a specific social group as a political and narrative strategy of repression (Eichler and Barnier-Khawam 2021), this article explores the emergence of a space of

judgement and perception extending beyond legal boundaries. This space is characterised by two main features. First, society becomes involved in the diaspora-related imported conflict. In the triadic relationship between diasporas, receiving states, and sending states (Vertovec 1999), the importation of criminalisation influences receiving states' legal systems and political culture. Second, this space creates a grey area of discretionary judgement, fostering fear due to unclear boundaries between permissible and illegal activities.

These dynamics are evident in points 5, 6, and 8 of the Memorandum. Despite political assurances that no changes will affect the PYD/YPG (Gunter 2022b), Point 5 commits Sweden and Finland to ensure no PKK activities occur on their territories, extending this prohibition to individuals and groups "affiliated and inspired" by the PKK. This vague language blurs lines between legal and illegal activities, targeting not only criminal acts but also any activity associated with the PKK. This ambiguity is highlighted by the statement that "Finland and Sweden reject the goals of these terrorist organisations".

Are political activities advocating for an autonomous Kurdistan in Syria now considered illegal? Is the political goal of autonomy, supported by many Kurdish organisations, treated as terror-linked? Various European organisations and political parties collaborate with Kurdish groups aligned with the PKK's ideology, known as 'democratic confederalism', which aims to establish Kurdish autonomous zones based on direct democracy, women's liberation, and ecology (Matin 2019). Many artists, students, activists, scholars, and publishers advocate for this cause and demand the release of Abdullah Öcalan, the PKK's co-founder and key political theorist, imprisoned in Turkey since 1999.

The implications of Point 5 are extensive. The PKK has shaped Kurdish national identity (van Bruinessen 2016; Yavuz 2001), and the Memorandum appears aimed at silencing undesired Kurdish voices, with the concrete risk of extending repression to an entire national movement. Point 6 demands that the two Nordic countries amend their laws to implement Point 5. In 2023, the Swedish Parliament passed a new anti-terrorism law after the Memorandum, although earlier discussions on this issue predated the deal with Turkey. Point 8 increases societal pressure by calling for deportation of suspected terrorists, prohibiting financing and recruitment for organisations remotely related to the PKK, and combating disinformation by preventing the abuse of domestic laws "for the benefit or promotion of terrorist organisations".

The challenge lies in defining the boundaries of these measures. Turkey's request for the extradition of an Iranian-Kurdish former Swedish parliament member with no legal ties to Turkey illustrates the ambiguity of such practices. The case raises doubts about the legitimacy and scope of Turkey's claims over Kurdish political expression beyond its borders. It also questions whether the promotion of

Kurdish autonomy in Syria is interpreted as a security threat, given Turkey's military presence in Kurdish areas of Syria and Iraq, and whether Kurdish initiatives not aligned with Ankara are systematically framed through a logic of securitisation.

The prohibition on financing organisations even loosely connected to the PKK has led to the closure of the Kurdish Red Crescent offices in Sweden, although a spokesperson has pointed out that, as happened in the past, the responsibility lies with the United States. However, the most significant impact may be the request to prevent “domestic laws from being abused for the benefit or promotion of terrorist organisations” (Point 8). The Turkish Ambassador to Sweden has called for the removal of PKK and PYD flags. Although Swedish and Finnish authorities claim they do not consider the PYD a terrorist organisation, the Ambassador insisted the Memorandum's terms must be taken seriously (Schwartz 2022). To date, as reported by a Kurdish lawyer residing in Sweden, there are no actual bans on displaying the flags, but Turkey's request to restrict such symbols to all Swedish citizens remains in place.

Although these may seem minor aspects, they show how the repression of elements within the Kurdish diaspora can spill over and have constraining effects on the host society as a whole. Such concerns regarding the implications of the Memorandum lead to the second aspect of imported criminalisation: the grey area of discretionary judgement. This is certainly the aspect that, more than any other, has been emphasised by the interviewees. Point 9 establishes a Permanent Joint Mechanism involving experts from the three countries' foreign affairs, justice, security, and intelligence agencies, creating potential for ongoing political negotiation behind judicial decisions. The possibility of political negotiations fosters uncertainty. Turkey's broad interpretation of terrorist activities, even targeting scholars who signed a peace petition, contrasts sharply with Swedish traditions of civil rights protection. This uncertainty creates widespread fear, particularly among the Kurdish community. A representative of the Kurdish Red Crescent stated:

“People feel supervised and targeted. They grow fearful of visiting the local Komele [Kurdish leftist political party], attending demonstrations, and if they go, unfolding a flag at such an event” (personal communication).

As philosopher Robert Gordon (1980, 560) noted, “fearing requires uncertainty of a particular kind: non-deliberative uncertainty, or uncertainty that is not due to one's being undecided among alternative actions”. Hakan Cifci, representing the Brussels-based KNK in Sweden, has stated in several interviews that the NATO deal has instilled fear among Kurds in Sweden and asylum seekers, as well as among their non-Kurdish supporters (MacDonald 2023), with reports of increased intimidation by Swedish intelligence (Broomfield 2023).

Kurdish communities in Sweden are not the only ones concerned about the new legislation. Although the amendment to Sweden's Terrorist Crime Act (SFS 2022:666)³, introducing new crimes linked to participation in terrorist organisations, was first proposed in 2017, its latest formulation was developed during negotiations with Turkey. The amendment, proposed by the Swedish government and endorsed by the Standing Committee on Justice, received broad support in the eight-party parliament – 268 votes in favour, 34 opposed, and 47 absent. Only members of the Greens and the Left Party opposed it. Nonetheless, the Council on Legislation raised concerns, cautioning that criminalising membership in terrorist organisations should be carefully limited to avoid undermining democratic principles, particularly freedom of opinion (Hofverberg 2023).

The polarised perspectives between left-wing progressives and right-wing conservatives are similarly reflected within Sweden's civil society. The Swedish Bar Association and Lund University Law School contended that the law exceeded the requirements necessary to meet Sweden's international obligations on terrorism and argued that the previous legislation, which targeted specific acts by members of terrorist groups, was adequate. In contrast, the Police and Migration Authority supported the new law, viewing it as a tool for complying with the Directive on Combating Terrorism (Hofverberg 2023).

Swedish civil society groups and left-wing media have raised two primary concerns: the erosion of civil rights for minorities and refugees, and the growing involvement of the Swedish Security Service (SÄPO), increasingly seen as criminalising the Kurdish population. In a personal communication, Ahmed Karamus, Co-Chair of the KNK, stated that following the agreement, SÄPO adopted Turkey's very broad view of what constitutes terrorism and reports "threats against individual Kurdish businesses to prevent them from supporting the Kurds". He added that "SÄPO is trying in every possible way to criminalise Kurds and wants to link them to criminal elements in Sweden".

One interviewee recounts that "Swedish government authorities do security checks on new employees through the regular police as well as SÄPO. This is only a formality to check the candidate. [...] All of a sudden, though, Kurds are getting blocked from employment by not passing SÄPO's security check".

On 8 April 2024, the left-wing magazine *Dagens ETC* published an article signed by 25 lawyers and legal experts, denouncing the growing criminalisation of Kurds in Sweden by SÄPO (Nisébini et al. 2024). The authors argue that due to heightened international relations with Turkey, SÄPO has begun classifying Kurdish political activities as 'terrorism', despite many Kurds seeking asylum in Sweden

³ The official document can be found at this link: <https://perma.cc/GUK7-BZFR>

for their political activism. It also highlights concerns over SÄPO monitoring lawyers representing Kurdish clients, raising serious issues regarding the violation of fundamental rights and democratic principles. Wackenhut (2024) documented the broadening of SÄPO's conceptualisation and problematisation of 'refugee espionage' activities, extending to Swedish citizens. These concerns highlight how imported criminalisation works: it begins as a tool of transnational repression targeting dissident communities abroad and ends up affecting society as a whole by targeting citizens and their activities. One interviewee stated that "this operation of spreading fear was palpable among the Kurdish diaspora in Sweden. It has left permanent effects as well as scars over those forked over as pieces of meat to placate an authoritarian state, and its grotesque security agency, in order for Sweden to join NATO".

Compared to Sweden, Finland's response has been more restrained. The Finnish government made legislative adjustments requested by Turkey, but with less visible impact on civil society. Domestic politics have largely supported these concessions, framing them as necessary compromises for national security. While isolated criticisms exist, Finnish society has broadly accepted the changes due to the Russian threat and strategic priorities (Yle News 2022). Kurdish communities in Finland share concerns similar to those in Sweden, but tensions remain limited, partly due to the Kurds' smaller historical presence in Finland (Juhola and Seppälä 2022).

The Nordic Kurdish Diaspora Activism: Before and After

The introduction of criminalising legislation and policies in Sweden and Finland was felt by Kurdish communities as a betrayal (France 24 2022). This stems from the traditionally supportive environment the Kurdish diaspora experienced there. Sweden, in particular, was the first European country to provide material and non-material support for Kurdish diasporic activities, fostering an environment conducive to the linguistic and cultural growth of the diaspora (Başer, Ahmedi, and Toivanen 2017). The Swedish government recognised the ethnic Kurdish identity – despite the Turkish, Iranian, Iraqi, or Syrian passport. Multicultural policies helped the Kurdish diaspora flourish, as the government financed and promoted Kurdish books, publishers, and a Kurdish library (Başer 2013a). Since the 1950s, Sweden has been a hub for Kurdish literature, with 40–50 Kurdish books published annually and 98 journals released between 1956 and 1998 (van Bruinessen 2000).

The peculiar condition of the Kurdish diaspora in Sweden stems from migration policies favouring refugee arrivals. Many Kurds arriving in the country were already politically active and remained vocal in Swedish society. Sweden became a safe haven for Kurds fleeing oppression, offering a chance to preserve their traditions and their often-banned mother tongue. Today, the Kurdish diaspora

in Sweden is estimated at more than seventy thousand members (Başer, Ahmedi, and Toivanen 2017; Eliassi 2013; Khayati and Dahlstedt 2014). The favourable environment encouraged new forms of political engagement and cultural production. Unlike elsewhere, where mobilisation is mainly political, Sweden shows a stronger presence of intellectually active Kurds focused on advancing Kurdish culture and literature (Başer, Emanuelsson, and Toivanen 2015). Van Bruinessen (1994; 1999) emphasised that in Sweden, Kurmanci literature and language could flourish even more than in their Middle Eastern homeland. For the same reason, Sweden was the first country where a unitary Kurdish identity could develop beyond the divisions reflecting Kurdistan's fragmentation among Turkey, Syria, Iraq, and Iran (Eliassi 2016), even allowing attempts to shift the Kurdish identity toward a more geographically based Kurdistan one (Eliassi 2015).

The Kurdish diaspora formation and mobilisation in Finland mirrored that in Sweden (Toivanen 2014), although it is much smaller, counting about seventeen thousand people speaking Kurdish in 2023 (Statistics Finland 2024). Notwithstanding the limited number, it is one of the most organised and active diasporas in Finland (Raja-aho 2018), benefiting from a welcoming and pro-multicultural environment like that found in Sweden. For this reason, in Finland, too, Kurds feel “to be sold out” after the Memorandum (Savolainen and Palmén 2022).

In both Nordic countries, the Kurdish diaspora faces growing uncertainty and fear as the safe haven for political refugees erodes, with Turkish repression now potentially extending to them. While it is too early to draw definitive conclusions about changes in mobilisation, some trends are already visible. The boundaries of what is considered illegal have become increasingly blurred: showing support for the Syrian Kurdish YPG or protesting against the Turkish president may suffice for Ankara to file an extradition request. In 2022, an initial request for the repatriation of 33 ‘terrorists’ quickly rose to around 130 after left-wing protesters hung a doll representing President Erdoğan on a bridge in central Stockholm (Zandonini 2023). A legal advisor for Amnesty International in Sweden noted that it was unclear who was at risk of deportation or whether an official list existed (Zandonini 2023). Vagueness and uncertainty create fear among those already in vulnerable positions. From the interviews conducted, it has indeed emerged that following the Trilateral Memorandum, those without citizenship are the most fearful and face the greatest difficulties in finding employment (*Banki, in this special issue*).

On the other hand, obtaining refugee status has become increasingly challenging. In 2023, Sweden's government implemented stricter migration policies, including heightened internal controls on foreigners and a significant reduction in the annual refugee quota. As a result, 2024 marks the lowest number of asylum applications since 1997, particularly from Iraq, Syria, and Somalia (Wahlström

2024). The same trend is observed in Finland, although the decline in asylum and temporary protection applications primarily relates to the Ukrainian conflict (UNHCR 2023).

However, while the restrictions in migration policy may negatively impact Sweden's previous reputation as a safe haven for Kurds, it is the expanded role of SÄPO in overseeing both asylum applications and deportations that raises the greatest concern. According to journalistic reports, in 2022, SÄPO issued 650 negative opinions on granting residence or citizenship permits. The Migration Agency has stated that it cannot provide data on specific nationalities. Nevertheless, several lawyers and community leaders believe that a substantial portion of these cases involve Kurds from Turkey (Zandonini 2023).

In conclusion, while a clear shift in the Kurdish diaspora mobilisation is not yet evident, the community perceives that their situation has already begun to change. The most significant alteration concerns a growing sense of uncertainty and fear, which now affects Kurdish communities, particularly the most politically active members, and even more so those who openly express their support for the YPG in Syria. According to Karamus, even people who had shown solidarity with the Kurdish movement have remained passive in recent years, out of fear of reprisals. The Council on Legislation highlighted the political implications of such criminalisation, asserting that similar laws would have condemned supporters of the African National Congress (ANC) in South Africa and the Front National pour la Libération du Sud Viêt Nam (FNL) in South Vietnam. Both liberation movements had many sympathisers in Sweden who raised money, provided premises for meetings, organised study groups and made propaganda for these movements (Hofverberg 2023). This clearly illuminates how the Memorandum broadens the space of illegality.

Conclusion

This article has highlighted an overlooked issue affecting diasporic groups: imported criminalisation. It is conceived as the adoption, by host countries, of the criminalisation and securitisation standards applied by countries of origin against their own diasporas. The article has explored this process through the case of the Trilateral Memorandum between Turkey, Sweden, and Finland, concerning the NATO accession of the two Nordic countries. By drawing on existing literature on conflict-generated diasporas, conflict importation and transnational repression, it examined the insecurities experienced within the Kurdish diaspora in Sweden and Finland as a result of the agreement with Turkey, situating them within the broader context of terror-linked securitisation and criminalisation.

I first observed the interplay between geopolitical contexts and diasporas, underscoring the international relevance of diasporic politics, a topic that warrants further exploration beyond the scope

of this article (*Adamson and Han; Naung Naung, both in this special issue*). Turkey, in fact, has exploited the insecurity generated by the war between Russia and Ukraine to expand its repressive reach toward the Kurdish diaspora in Sweden and Finland. Moreover, it has done so by adopting and extending the post-9/11 securitisation discourse of counter-terrorism. Turkey has used the ‘terrorist stigma’ (Casier 2019) to legitimise policies of criminalisation and securitisation targeting dissidents in third countries.

The Memorandum mandates legal amendments and increased cooperation between Swedish, Finnish, and Turkish authorities to identify and target individuals suspected of terrorism. However, Turkey’s loose interpretation of terrorism extends beyond the definitions used by Sweden and Finland, resulting in a form of imported criminalisation. This concept involves adopting, even partially, the repressive measures of a state with lower democratic standards against diasporic groups in another state.

While Swedish and Finnish authorities assert that the agreement is non-binding and political, concerns persist about its impact on civil liberties. Gunter (2022b) argues that legal protections safeguard European citizens and suggests that the political intent behind the agreement is to appease Turkey, with the hope of later reducing its demands.

Nevertheless, imported criminalisation creates a climate of uncertainty, potentially restricting rights and freedoms, even if Turkish demands are mitigated. This uncertainty alone can criminalise entire communities, affecting not only Kurdish immigrants but also citizens. The concept of imported criminalisation is a useful lens to investigate the triangulation between diasporas and receiving and sending states. It reveals how diaspora-related conflicts and transnational repression have the potential to affect the receiving society as a whole, broadening the space of illegality.

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Statements of Ethics

According to the University of Florence's policies, independent projects do not require ethical approval. The project complies with the general guidelines established by Italian Legislative Decree No. 101/2018 and by Rectoral Decree 245/2025, concerning informed consent procedures, data anonymisation, and secure data management.