

HOW THE EEA ENABLES INDIRECT PARTICIPATION IN THE EU'S CFSP: THE CASE OF NORWAY ^{1 2}

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Abstract : The European Economic Area (EEA) extends the European Union (EU) internal market to three European Free Trade Association (EFTA) states (EEA/EFTA states) and is commonly viewed as a predominantly economic integration framework. Recent geopolitical developments and the evolving EU security and defence agenda, however, raise the question of whether participation in the EEA can directly or indirectly serve as a channel for aligning the foreign and security policies of EEA/EFTA states with the objectives of the EU's Common Foreign and Security Policy (CFSP). The present article, through an analysis of legal acts, soft-law instruments, programmes, and strategies, focuses on the Kingdom of Norway which, as the only EEA/EFTA member state that is also a NATO member, possesses a well-developed defence industrial base and cooperates closely with the EU on security matters. On this basis, we then address the question of whether the EEA Agreement also gives rise to integration in the field of the CFSP.

Keywords: European Economic Area, European Union, Integration, Common Foreign and Security Policy, European Defense Fund

Introduction

The European Economic Area, established in 1994 on the basis of the 1992 Agreement on the European Economic Area, is a unique system of regional cooperation which, compared to other regional cooperation organizations, is particularly closely linked to the European Union. The EEA has created a homogeneous economic area guaranteeing the free movement of goods, persons, services, and capital. The EEA thus links the EU and the European Free Trade Association countries that are parties to the EEA Agreement and extends the EU internal market to these countries. As the EU is one of the pillars of the EEA, its future development is closely linked to that of the EU itself. However, this may result in

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certain disparities with EEA/EFTA states on several levels. Originally an economic integration mechanism, the EEA has gradually become a platform enabling participation in non-economic EU policies, including security and defense through soft-law and program participation. Although the EEA includes Liechtenstein, Iceland, and Norway, only Norway plays a substantial role in security and defense cooperation with the EU due to its NATO membership, developed defense industry, and participation in defence funding instruments. This article analyzes Norway's participation in the common foreign, security, and defense policy through the instruments offered under the current legal framework of the EEA Agreement. On the one hand, this does not apply to the CFSP itself, but within the framework of enhanced cooperation, there are possibilities for indirectly establishing cooperation in this area even through the framework of the EEA Agreement. The question we seek to answer in the present article is: Does Norway's involvement through EU programmes constitute de facto CFSP integration beyond the EEA's legal scope? In accordance with this research question, we will test the following hypothesis: Norway's programme-based cooperation with the EU effectively extends the EEA beyond economic integration, without a formal revision of the Agreement. We will focus on these possibilities in the following chapters through analysis, comparison, and synthesis of legislation, soft law, and professional literature. The structure of this article is as follows: in the first chapter, we will define the theoretical and legal basis of Norway's relationship with the CFSP; in the second chapter, we will describe and characterize the European Defense Fund, which we will follow up on in the third chapter, where we will focus on Norway's participation in the fund. In the fourth chapter, we will look at the possibilities of extending the EEA Agreement to the CFSP, and in the final chapter, we will summarize our findings and draw conclusions.

The Kingdom of Norway's relationship to the EU's common foreign, security and defense policy – theoretical and legal aspects

The pragmatic solution selected by Norway to delineate its relationship to the European integration process, while preserving the utmost degree of autonomy, is through membership in the European Economic Area (hereinafter referred to as the "EEA"), of which it is a member in conjunction with Iceland, Liechtenstein, and the EU. As stated in the introduction, the EEA essentially integrates Norway into the EU single market⁴ and extends this cooperation to other areas⁵, including those that go beyond the four freedoms of the market.⁶

⁴ Article 1 par. 1 and par 2 (a) – (d) EEA Agreement

⁵ Article 1 par. 2 (e) and (f) EEA Agreement

⁶ Article 78 EEA Agreement

Norway is widely regarded as the EU's most significant security and defence collaborator. This close cooperation is predicated on a foundation of common values and shared interests. In practical terms, this is reflected, for example, in the adoption of a common position when taking restrictive measures against third countries.⁷

However, the EEA Agreement does not contain any provisions directly related to the common foreign, security, and defense policy (hereinafter referred to as "CFSP"). In general terms, Norway's involvement in the EEA is limited to a "dialogue" with the CFSP, which does not in itself commit it to participating in the CFSP.⁸ It is acknowledged that this dialogue may be conducted in a number of ways. Despite the exclusion of the CFSP from the scope of the Agreement, there are possibilities for states to establish a certain degree of cooperation in this area within the current legal framework.

One method of establishing cooperation in the field of CFSP under the EEA Agreement is through the implementation of specific programmes. The sixth part of the European Economic Area (EEA) Agreement provides comprehensive regulation of forms of cooperation that fall outside the remit of the four freedoms. The preliminary provision of this section comprises a list of areas in which the contracting parties to the Agreement may establish, strengthen, and expand their cooperation.⁹ A fundamental component of this section of the EEA Agreement is the provision that enables EEA/EFTA Member States to engage and participate in a number of European Union programmes.¹⁰ This opportunity is considered to be a significant instrument in facilitating their integration into the single market, while also contributing to the enhancement of cooperation between the EU and the respective countries in multiple domains.¹¹ These programmes form part of the EU's multiannual financial framework, which delineates priority areas for funding over a period of several years in accordance with the EU's political objectives and priorities.¹²

⁷ Security and Defence partnership between the European Union and Norway par. 3

⁸ Alyson J.K. Bayles and Baldur Thorhallsson: "Iceland and the European Security and Defence Policy," in *The Nordic Countries and the European Security and Defence Policy*, eds. Alyson J.K. Bailes, Gunilla Herolf, Bengt Sundelius (Oxford: Oxford University Press, 2006) p. 328

⁹ Article 78 EEA Agreement

¹⁰ Article 80 EEA Agreement

¹¹ EEA Agreement A commentary p. 758 par. 3

¹² For example: Multiannual financial framework: <https://www.europarl.europa.eu/factsheets/en/sheet/29/multiannual-financial-framework>, Council Regulation (EU, Euratom) 2020/2093 of 17 December 2020 laying down the multiannual financial framework for the years 2021 to 2027, Council Regulation (EU, Euratom) 2024/765 of 29 February 2024 amending Regulation (EU, Euratom) 2020/2093 laying down the multiannual financial framework for the years 2021 to 2027

The EEA/EFTA Member States have negotiated participation in several programmes in the current multiannual financial framework, in line with their priority areas of cooperation. One or more EEA/EFTA states participate in 15 programmes under the multiannual financial framework for 2021-2027, either fully or partially. The following programmes are available: Horizon Europe, European Defence Fund, Digital Europe, LIFE, Erasmus+, European Solidarity Corps, ESF+/EaSI, Single Market Programme, EU Civil Protection Mechanism, EU Space Programme, Creative Europe, EU4Health, ASAP, EDIRPA.¹³ Despite the heterogeneity of these programmes, encompassing numerous thematic domains, they constitute a modest fraction of the aggregate EU programme portfolio.¹⁴ A considerable proportion of these programmes pertain to domains that do not fall squarely within the purview of the EEA Agreement, such as the CFSP and the common agricultural and fisheries policies. Alternatively, they are associated with the Structural Funds, a domain in which the EEA/EFTA states have elected not to participate.¹⁵ The participation of EEA/EFTA Member States in current EU programmes is not consistent and varies from case to case. For the purposes of this article, however, it is important to note that despite the exclusion of the CFSP from the scope of the EEA Agreement, it is precisely through the possibility of participating in EU programmes that EEA/EFTA member states can participate in programmes that fall under the CFSP and thus indirectly participate in it. In accordance with the prevailing multiannual financial framework, Norway is the sole EEA/EFTA member state participating in CFSP programmes.¹⁶ Specifically, these are three programs: the European Defense Fund¹⁷, ASAP (aimed at supporting the increase of ammunition production capacities)¹⁸, and EDIRPA (aimed at supporting cooperation between member states in the joint procurement of defense equipment).¹⁹

A secondary method of indirect participation in the CFSP under the EEA is through various "policy initiative packages." In light of the legislative and institutional connections with the EU, these initiatives fall within the powers delineated in the

¹³ More on: <https://www.efta.int/eea-relations-eu/policy-areas/horizontal-policies/eu-programmes-eea-efta-participation>

¹⁴ More on: <https://www.europarl.europa.eu/factsheets/en/sheet/29/multiannual-financial-framework>

¹⁵ EEA Agreement A commentary p. 759 par. 5

¹⁶ More on: <https://www.efta.int/eea-relations-eu/policy-areas/horizontal-policies/eu-programmes-eea-efta-participation>

¹⁷ More on: https://defence-industry-space.ec.europa.eu/eu-defence-industry/european-defence-fund-edf-official-webpage-european-commission_en?prefLang=fr

¹⁸ More on: https://defence-industry-space.ec.europa.eu/eu-defence-industry/asap-boosting-defence-production_en

¹⁹ More on: https://defence-industry-space.ec.europa.eu/eu-defence-industry/edirpa-addressing-capability-gaps_en

EU's founding treaties. However, it should be noted that these powers do not necessarily take into account the scope of the EEA or the interests of EFTA states. In general, legislation adopted by the EU that is relevant to the EEA is transposed by EEA/EFTA states into their national legal systems. It is then interpreted in accordance with the Treaties. The question of whether the legislation that has been adopted falls within the scope of the EEA Agreement and will be incorporated into it is then within the competence of the EEA Joint Committee, which may reject or approve the adopted legislation. In recent years, there has been an observable tendency in the legislation adopted by the EU that could be characterised as "competence creep." With regard to the EEA, this primarily pertains to instances where legislation that has been adopted is categorised as pertinent to the EEA, despite its clear extension beyond the scope of the EEA Agreement.

The EU's internal security policy on counter-terrorism and the European Security Program can therefore facilitate a coordinated utilisation of rules or measures within the domains of the internal market, justice and home affairs, defence, and external action. Such extensive policy initiatives have the potential to engender substantial political, practical, and legal challenges for Norway and other EFTA states. This has precipitated an imperative to conclude a number of accords with the EU in various policy domains, most notably in the areas of justice and home affairs, and defence and security.²⁰ In the domain of defence and security, Norway and the EU have entered into a series of cooperative accords and political dialogue agreements. These include the Memorandum of Understanding on Engagement in the EU's Nordic Battle Group²¹, the Cooperation Agreement that establishes a broad framework for collaboration within the European Defence Agency (EDA)²², and the Agreement on Norway's Involvement in EU Civilian and Military Operations.²³ In the domain of security and defence, Norway has not concluded a single comprehensive umbrella agreement such as the EEA Agreement or Schengen. Nevertheless, these accords signify substantial political connections with the EU. Participation in the European Defence Agency (EDA) since 2006 has also been of considerable importance in terms of the Norwegian defence industry's significant market presence. Since 2014, the EEA Agreement has incorporated comprehensive regulations on defence procurement under the auspices of the Defence and Security Procurement

²⁰ EEA Agreement A commentary p. 63

²¹ More on: https://tap.mk.gov.lv/doc/2005/AlMss_310114.431.pdf

²² More on: <https://eda.europa.eu/docs/default-source/documents/aa---eda---mod-norway-07-03-06.pdf>

²³ Agreement between the European Union and the Kingdom of Norway establishing a framework for the participation of the Kingdom of Norway in European Union crisis management operations, more on: <https://eur-lex.europa.eu/legal-content/SK/TXT/?uri=celex%3A22005A0314%2802%29>

Directive.²⁴ The EDA has developed a suite of tools to facilitate the implementation of the directive by contracting states. The overarching objective of the EDA Supply Chain Action Plan is to provide support to industry by addressing supply chain issues in a comprehensive manner with a view to promoting the creation of a globally competitive European defence equipment market.²⁵

European Defense Fund

The establishment of the European Defense Fund (henceforth referred to as "EDF") can be traced back to the preceding three years in direct connection with the war in Ukraine. In the 2016 State of the Union Address, the then President of the European Commission, Jean-Claude Juncker²⁶, emphasised the necessity for the EU to be capable of protecting and strengthening its defence capabilities. In light of these developments, the European Commission unveiled an Action Plan for European Defense at the conclusion of 2016.²⁷ The proposed measures were centred on addressing the capabilities and support requirements of the European defence industry. The strategy was founded on three complementary pillars: the establishment of a European Defense Fund, the promotion of investment in the defense supply chain, and the reinforcement of the single market in the field of defense, where fragmentation and inadequate industrial cooperation had been identified.²⁸

The Regulation of the European Parliament and of the Council establishing a European Defense Industry Program to support the competitiveness and innovation capacity of the Union's defense industry was adopted on 18 July 2018.²⁹ The objective of the legislation was to: It is vital to provide support for the competitiveness, efficiency and innovative capacity of the defence industry across the Union, thereby contributing to the Union's strategic autonomy. This can be achieved by supporting activities in their development phase, promoting and encouraging cooperation

²⁴ Directive 2009/81/EC of the European Parliament and of the Council of 13 July 2009 on the coordination of procedures for the award of certain works contracts, supply contracts and service contracts by contracting authorities or entities in the fields of defence and security, and amending Directives 2004/17/EC and 2004/18/EC

²⁵ EEA Agreement A commentary p. 64

²⁶ European Commission: State of the Union 2016: "Towards a better Europe – a Europe that protects, empowers and defends", 14 September 2016.

²⁷ European Commission: Communication from the European Commission to the European Parliament, the European Council, the Council, the European Economic and Social Committee and the Committee of the Regions: European Defense Action Plan, 30 November 2016

²⁸ Ibidem p. 2 and 5

²⁹ Regulation (EU) 2018/1092 of the European Parliament and of the Council of 18 July 2018 establishing the European Defense Industry Development Program to support the competitiveness and innovation capacity of the Union's defense industry

between companies, including SMEs and mid-cap companies, across the Union, and cooperation between Member States in the development of defence industry products or technologies. Such measures would serve to strengthen and improve the agility of defence supply and value chains, while enhancing the standardisation and interoperability of defence systems. In order to promote the optimal utilisation of defence research outcomes and facilitate post-research development, it is essential to enhance the competitiveness of the European defence industry within both the domestic and global markets. This objective can be pursued, when appropriate, through consolidation measures.³⁰ To this end, €500 million in funding was allocated for the period from January 1, 2019, to December 31, 2020.³¹

This Regulation was subsequently repealed and replaced by Regulation (EU) 2021/697 of the European Parliament and of the Council of 29 April 2021 establishing the European Defence Fund and repealing Regulation (EU) 2018/1092.³² The initial distinction from the preceding legislation was, notably, the synchronisation of the EDF's financial cycle with the span of the multiannual financial framework – in this instance, spanning the years 2021 to 2027.³³ The second was an increase in the budget to almost €8 billion,³⁴ which was divided between research actions (€2.651 billion) and development actions (€5.302 billion).³⁵

Participation of the Kingdom of Norway in the European Defense Fund

Of the three EEA/EFTA member countries, Norway is the only one with a developed defence industry. It is therefore logical that, from a practical point of view, it is the only country participating in defence programmes within the EEA.

Norway's involvement in the programme that preceded the European Defence Industry Development Programme is documented, specifically the so-called Preparatory Action in the field of defence industry from 2017 to 2019.

Consequently, in June 2018, the European Commission adopted a proposal for a regulation on the EDA, Article 5 of which also permitted the involvement of EFTA and

³⁰ Ibidem Article 3 (a) – (c)

³¹ Ibidem Article 4

³² Regulation (EU) 2021/697 of the European Parliament and of the Council of 29 April 2021 establishing the European Defense Fund and repealing Regulation (EU) 2018/1092

³³ For example: Multiannual Financial Framework: <https://www.europarl.europa.eu/factsheets/en/sheet/29/multiannual-financial-framework>, Council Regulation (EU) 2020/2093 of 17 December 2020 laying down the multiannual financial framework for the years 2021 to 2027 and Council Regulation (EU) 2024/765 of 29 February 2024 amending Regulation 2020/2093 laying down the multiannual financial framework for the years 2021 to 2027

³⁴ Article 4(1) of Regulation (EU) 2021/697 of the European Parliament and of the Council of 29 April 2021 establishing the European Defence Fund and repealing Regulation (EU) 2018/1092

³⁵ Ibidem Article 4(2)(a) and (b)

EEA associated countries. However, in November 2018, the Council of the EU imposed restrictions on the application of this paragraph. The decision was taken that "*since the proposed regulation forms part of a package of proposals related to the MFF, all provisions with budgetary implications or of a horizontal nature have been removed and are therefore excluded from the partial general approach aimed at achieving further progress on the MFF.*" Despite the fact that the issue of associated countries is not directly related to the MFF, the provisions concerning third countries to be considered as associated countries within the framework of the Fund (Article 5) have also been postponed until agreement on the MFF is reached. From a Norwegian perspective, the linkage of the formal recognition of associated countries to the general discussion on the MFF was particularly unfortunate, as it impeded the planning and preparation of both the government and industry.³⁶ At the time, the decision can be understood to be primarily informed by the circumstances that arose in the aftermath of the Brexit referendum.

In 2019, the Norwegian Ministry of Defence received an analysis prepared by the consulting and auditing firm BDO. This analysis assessed the benefits and risks of Norway's participation in the EDF. The report concluded that, in the long term, it would be more costly for Norway not to participate in the EDF than to participate in it. The report's conclusions indicate that participation in the EDA would have several beneficial effects. Firstly, it would strengthen political dialogue and coordination with the EU. Secondly, it would enable the evaluation of previous investments in research and development. Thirdly, it would promote the international competitiveness of the Norwegian defence industry. Conversely, the report indicates that a decision not to participate in the EDF would risk a decline in Norwegian defence exports to the EU of up to approximately 60% over time.³⁷ This decline would have a negative impact not only on the economy but also on Norway's national security. Following a thorough examination of the available evidence, it appears that Norway made endeavours towards the EU, seeking to persuade the pertinent institutions to rescind the restriction stipulated in Article 5. The objective of this initiative was to facilitate the involvement of the Norwegian defence industry within the ambit of the EDA. The EU Committee of Permanent Representatives finally lifted this restriction on 28 September 2020. In this regard, Norway was able to commence participation in the EDF immediately upon fulfilling the formal criteria.³⁸

As regards the use of European Union budget funds for benefits intended for third countries, the European Defense Fund Regulation (hereinafter referred to as the

³⁶ Friis, K.: The European Defence Fund and Norway, Norwegian Institute of International Affairs, Policy brief 13/2020 p. 3

³⁷ Ibidem p. 3 and 4

³⁸ Ibidem p. 4

"EDF") of April 2021 stipulates that, in addition to third countries that are members of the European Economic Area (EEA)³⁹, only entities established in EU Member States or associated countries are eligible for EDF grant schemes, provided that they are not controlled by third countries or their entities.⁴⁰ In the case of exceptions to this rule, unauthorized access by non-associated third countries or entities controlled by them to classified information related to projects supported by the fund is expressly prohibited.⁴¹ Although these restrictions are justified from the perspective of taxpayers in EU and EEA member states, the regulation also restricts access to the EDF for companies based outside the EU, as well as for their subsidiaries established in the EU or partners linked through a shareholder structure.⁴² Particularly controversial in the transatlantic context was the provision that ownership of intellectual property and results generated with EDF support must remain in the EU or an associated country.⁴³ However, the list of projects funded by the Preparatory Action on Defense Research and the Program to Support the Development of the European Defense Industry (predecessors of the EOF), published by the Commission in June 2020, included four projects involving EU subsidiaries controlled by entities from the US, Canada, and Japan.⁴⁴ The results of the first call for proposals under the EDF in July 2022 showed that of the 61 projects supported and approximately 700 entities involved (43% of which were SMEs), 35 entities were from Norway – the only country outside the EU that contributes to the general budget of the Union and also benefits from the ERF.⁴⁵

However, the 'pay to play' logic, resulting from EEA membership, does not apply to the European Peace Facility (EPF). The EPF, as an off-budget instrument, supports military and defence activities in pursuit of the objectives of the common security and defence policy. The situation could be subject to change should the EDF be incorporated into the EU budget, as has been proposed by some in order to strengthen democratic oversight and budgetary control. The situation could be subject to change should the EDF be incorporated into the EU budget, as has been proposed by some in order to strengthen democratic oversight and budgetary

³⁹ Article 5 of Regulation (EU) 2021/697 of the European Parliament and of the Council of 29 April 2021 establishing the European Defense Fund and repealing Regulation (EU) 2018/1092

⁴⁰ Ibidem Article 9 (1) and (3)

⁴¹ Ibidem Article 9 (4)

⁴² Blockmans, S.: Keeping up with the emerging European Defence Union: synchronising third country participation – Norwegian Institute of International Affairs, Research paper 2/2022 p. 8

⁴³ T. Nagy (ed.), 'One Step Closer: Towards Deeper and Wider EU Defence Partnerships', GLOBSEC Policy Institute

⁴⁴ European Commission press release of 15 June 2020: European Defense Fund: €205 million to support the EU's strategic autonomy and competitiveness

⁴⁵ European Commission press release of July 20, 2022: Defense industry: EU takes steps to invest €1.2 billion to support cooperation in 61 defense projects

control by the European Parliament. In the event of such a development, it could be expected that the EDF would also become more important from the perspective of the EEA states, as is the case with the EDF.⁴⁶

Subheading Possibility of extending the scope of the EEA Agreement to the CFSP

In the preceding chapters, the potential for indirect cooperation has been delineated within the existing legal framework of the CFSP, the European Defense Fund, and Norway's involvement therein. However, the question remains whether, in view of the current geopolitical and security situation, it would be possible in the future to extend the scope of the EEA Agreement in its current wording to include the hitherto excluded area of CFSP. The primary solution that can be contemplated from the outset is the amendment of the EEA Agreement itself through the establishment of a new international agreement. As previously indicated in preceding chapters, a secondary solution would be to instigate and endorse a new comprehensive international agreement that would establish a coherent legal framework directly enabling the participation of EEA/EFTA member countries in the EU's CFSP. The third solution is offered by the EEA Agreement itself through a "revision procedure." Article 118(1) of the EEA Agreement states the following in this regard: *"If a Contracting Party considers that it would be useful in the interests of all the other Contracting Parties to develop the relations established by this Agreement by extending them to areas not covered by this Agreement, it shall submit a reasoned request to the other Contracting Parties within the EEA Council. The EEA Council may instruct the EEA Joint Committee to examine all aspects of the request and to report back. Where appropriate, the EEA Council shall take political decisions with a view to opening negotiations between the Contracting Parties."*⁴⁷ This is essentially a process similar to the revision procedure as set out in Article 48 TEU.⁴⁸ This provision is also referred to in specialist literature as the *"evolutionary clause,"* which allows the contracting parties to develop the relations already governed by the EEA Agreement and to extend cooperation to areas not covered by the Agreement. This procedure is subject to the consent of the contracting parties in paragraph 2 of the provision in question: *"Agreements resulting from the negotiations referred to in paragraph 1 shall be subject to ratification or approval by the Contracting Parties in accordance with their own procedures."*⁴⁹ Could Article 118 of the EEA Agreement therefore serve as an

⁴⁶ Blockmans, S.: Keeping up with the emerging European Defence Union: synchronising third country participation – Norwegian Institute of International Affairs, Research paper 2/2022 p. 8

⁴⁷ Article 118 (1) EEA Agreement

⁴⁸ EEA Agreement A commentary p. 905

⁴⁹ Article 118 (2) EEA Agreement

appropriate instrument for revising the EEA Agreement, by means of which its scope would be extended to include the CFSP ?

However, any such extension would only be feasible if it concerned areas falling within the competence of the EU. Given the specific nature of the EEA legal order, any extension under Article 118 of the EEA Agreement would primarily concern the main areas of EU competence, i.e. those in which EU institutions such as the European Commission and the Court of Justice of the European Union have powers. It is therefore unlikely that Article 118 of the EEA Agreement could serve as a basis for extending the EEA to areas such as the CFSP, given its specific institutional arrangements within the EU legal system. Otherwise, this policy could take on a more supranational character within the EEA than it does in the EU itself.⁵⁰

Conclusion

As was mentioned in the preceding chapters, the EEA establishes a distinctive system of regional cooperation that is particularly associated with the European Union in comparison to other regional cooperation organisations. Although the EEA Agreement does not directly apply to the CFSP, EEA/EFTA member states can participate indirectly through the instruments of the current legal framework by participating in various programmes, scientific projects and political initiatives. A notable example in this regard is Norway, which, in addition to being the only member of the EEA/EFTA EFTA member that is also a member of NATO, has become the EU's closest partner in the field of security and defence through a series of special agreements and memoranda, as repeatedly demonstrated by its joint approach to adopting restrictive measures towards third countries. Despite certain limitations, Norway is emerging as a proactive partner in the field of defence, actively participating not only in research projects financed by the European Defence Fund, but also ranking among the countries with the highest number of projects financed by this financial instrument. In light of the prevailing circumstances, it can be deduced that the ongoing collaboration between Norway and the EU in the domain of defence is likely to persist at a comparable level to that which is currently observed. Moreover, in consideration of the present stance adopted by the US, it is plausible to infer that this collaborative endeavour is poised to deepen, albeit not in a direct manner through the EEA, which, nevertheless, assumes a pivotal role in this context, particularly with respect to the prospect of engagement in defence initiatives.

⁵⁰ EEA Agreement A commentary p. 911

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