



“Internationalisation in balance” – cross-border regional effects on limiting international student mobility

ITEM Cross-Border Impact Assessment 2024



Dossier 7: “Internationalisation in balance” – cross-border regional effects on limiting international student mobility

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Contents

Abbreviations	2
1. Introduction.....	3
2. Objectives & Method	6
2.1. Ex-ante assessment	6
2.2. Demarcation of analysis: (cross-)border territory and research themes.....	7
3. Balanced Internationalisation Bill	10
3.1 Other developments regarding the internationalisation of higher education	13
4. Trends in the internationalisation of higher education	14
4.1. The Netherlands.....	14
4.2. Looking across the border	22
4.3. Euregional practices and examples	30
5. Evaluation of the European Integration Theme	34
6. Evaluation of the theme of socio-economic development	39
7. Evaluation of the theme of Euregional Cohesion	47
8. Conclusions and recommendations from a Euregional perspective	50
8.1. Euregional implications for policy and practice	53

Abbreviations

EEA	European Economic Area
EMR	Euregio Meuse-Rhine
RUG	<i>Rijksuniversiteit Groningen</i>
OCW	<i>Onderwijs, Cultuur en Wetenschap</i> (Education, Culture, and Science)
TAO	<i>Toets Anderstalig Onderwijs</i> (Foreign Language Education Test)
UM	Maastricht University
UNL	<i>Universiteiten van Nederland</i>
WHW	<i>Wet op het hoger onderwijs en wetenschappelijk onderzoek</i> (Higher Education and Scientific Research Act)
WIB	<i>Wet internationalisering in balans</i> (Balanced Internationalisation bill)

1. Introduction

During the past years, the Netherlands witnessed heated debates over the internationalisation of higher education. While it is acknowledged that international students contribute to science, the economy, and the labour market in the Netherlands, it is argued that the increasing flows cause risks regarding the quality, accessibility, absorption capacity (e.g., housing), and funding of the Dutch higher education system. As of January 2023, universities were asked by the Dutch government to stop the active recruitment of international students. In general, balancing student mobility rights and national higher education autonomy, financing and related topics has been a subject of debate for some time already.¹ Figure 1 portrays illustratively this balance between national sovereignty and European freedoms and cooperation.

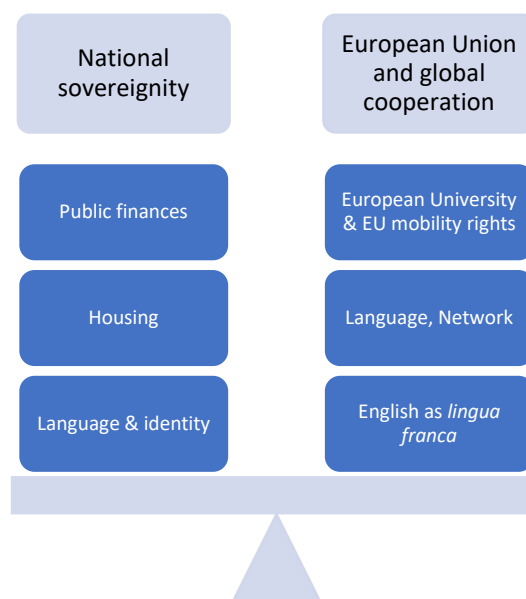


Figure 1: Balance between national sovereignty and European freedoms and cooperation

To achieve more balance between the benefits and challenges associated with the internationalisation of higher education, former Minister of Education, Culture and Science (*Onderwijs, Cultuur en Wetenschap*, OCW) Robbert Dijkgraaf developed a legislative proposal known as the Balanced Internationalisation Bill (*Wet internationalisering in balans*, WIB). On 13 May 2024, he submitted the WIB to the Dutch House of Representatives (*Tweede Kamer*). To get to this stage, discussions were held with representatives of Dutch higher education institutions including Dutch and international students, representatives of companies, regional authorities, and civil society organisations. Previous versions of the WIB went through an online public consultation between 14 July 2023 and 15 September 2023², were reviewed by the Education Council (*Onderwijsraad*) and the Council of State (*Raad van State*) at the beginning of 2024. The Standing Committee on Education, Culture and Science (OCW) of the House of Representatives submitted their report including questions about the WIB to the Minister on 28 June 2024.³ The questions were answered on 15 October 2024 by the new Minister of OCW, Eppo Bruins. On the same day, he sent a letter to the House of Representatives announcing that he would introduce stricter rules for a more rigorous implementation of the WIB in line with the

¹ Hoogenboom, A. (2016). Balancing student mobility rights and national higher education autonomy. Doctoral Thesis, Maastricht University.

² Maastricht University, Internationalisation in Balance bill submitted for consultation, <https://www.maastrichtuniversity.nl/news/internationalisation-balance-bill-submitted-consultation> (21 July 2023).

³ Tweede Kamer, Wetvoorstel Wet internationalisering in balans, Retrieved November 2024 from <https://www.tweedekamer.nl/kamerstukken/wetsvoorstellen/detail?cfg=wetsvoorsteldetails&modal=true&qry=wetsvoorstel%3A36555&modal=true>

Hoofddlijnenakkoord and the coalition agreement to prevent exceptions to it becoming the rule.⁴ In the meantime, the Foreign Language Education Test (*Toets Anderstalig Onderwijs*; TAO) was published as administrative order for consultation.⁵ In the framework of the Budget of OCW for 2025, the coalition together with some parties from the opposition submitted an amendment, which, among other things, calls for the adjustment of the TAO in “a way that the intake of international students will be maintained in regions, where the consequences of the WIB have an impact on the educational offer, e.g., but not limited to Zeeland (Middelburg), Limburg (Maastricht), Friesland (Leeuwarden), Groningen, Drenthe (Emmen), and Twente (Enschede). Regions that depend on the influx of international students. In this way, education in (shrinking) regions is safeguarded into the future” (authors’ translation).

Following the presentation of the self-management proposal by the Dutch universities⁶, another amendment (Krul C.S.) was proposed and approved by the Parliament in May 2025. The amendment called upon the government not to apply the TAO on the current educational offer, but leaving that up to the self-management plans of the universities. At the moment of finalising this report (July 2025), the Minister of OCW (by then in caretaker capacity due to the fall of the coalition in June 2025) indicated that the WIB will be amended. The regional circumstances will be added to the legislative text of the WIB itself, instead of the TAO as ministerial decree.⁷ In this respect, there will be a definition of shrinkage regions and regions that are close to shrinkage regions. On the 3rd of July 2025, the Minister reported on how the amendment of Krul C.S., approved by the Parliament, will be implemented.⁸ Emphasising that the legislative bill has the aim to limit internationalisation and promote the Dutch language in higher education and the Minister would like to keep the legislative power to enforce via the TAO, the Minister acknowledges the will of the Parliament to exempt the current educational offer from the TAO. New tracks, including foreign-taught tracks of existing programmes, or programmes will still have to undergo the TAO. The exact conditions to the implementation of the amendment will be formulated and explored in the upcoming period. Also, the Council of State will again be requested for advice. The outcome of this and the amended WIB and TAO are expected in fall 2025.

⁴ Rijksoverheid, Kabinet maakt Nederlandse taal de norm en beperkt studiemigratie, <https://www.rijksoverheid.nl/regering/bewindspersonen/eppo-b Bruins/nieuws/2024/10/15/kabinet-maakt-nederlandse-taal-de-norm-en-beperkt-studiemigratie> (15 October 2024)

⁵ Internetconsultatie, AMvB en ministeriële regeling voor de toets anderstalig onderwijs, Retrieved November 2024 from <https://www.internetconsultatie.nl/toetsanderstaligonderwijs/b1>

⁶ Universiteiten van Nederland, Universiteiten gaan zelf internationalisering verder in balans brengen, <https://www.universiteitenvannederland.nl/actueel/nieuws/universiteiten-gaan-zelf-internationalisering-verder-in-balans-brengen> (15 April 2025).

⁷ Rijksoverheid, Nota van wijziging Wet internationalisering in balans: steviger verankering positie regio, <https://www.rijksoverheid.nl/ministeries/ministerie-van-onderwijs-cultuur-en-wetenschap/documenten/kamerstukken/2025/02/07/nota-van-wijziging-wet-internationalisering-in-balans-steviger-verankering-positie-regio> (7 February 2025)

⁸ Rijksoverheid, Kamerbrief over uitvoering moties WIB en studiefinanciering internationale studenten, <https://www.rijksoverheid.nl/documenten/kamerstukken/2025/07/03/uitvoering-moties-wib-en-vervolproces> (3 July 2025)

Figure 2: Schematic overview legislative and political developments



If the House of Representatives approves the WIB, four more steps are needed for it to become law and enter into force. These are 1) approval by the Senate (*Eerste Kamer*), 2) signature/ ratification by the King, 3) signature/ratification by the Ministry of OCW, and finally 4) publication in the official Gazette (*Staatsblad*). The proposed bill aims at managing international student mobility to the Netherlands. It concerns Bachelor's and associate degrees offered by universities and universities of applied sciences. The WIB stands on two pillars, namely 1) language policy, and 2) defining the maximum number of students. Both pillars include several measures as described in the table below.

Table 1: Pillars of the Balanced Internationalisation Bill

Pillar	Measures
Language	<ol style="list-style-type: none"> Foreign Language Education Test (<i>Toets Anderstalig Onderwijs</i>, TAO) that sets the conditions under which courses can be taught in foreign languages Promoting Dutch language skills of Dutch and international students
Maximum	<ol style="list-style-type: none"> Numerus fixus for associate or Bachelor's degree programmes Maximum number of places for non-European students if teaching capacity is limited Temporary cap on courses experiencing sudden increases in enrolment for one year

The language pillar proposes the introduction of the Foreign Language Education Test (*Toets Anderstalig Onderwijs*, TAO), which is one of the most debated aspects of the WIB – as already becomes clear from the previously summarised political development. Higher education institutions have to undergo this test to obtain permission to offer existing and new bachelor's and associate degrees in foreign languages. A study programme is regarded as a "foreign-language" degree if more than a third of study credits are assigned for components that are not taught in Dutch.⁹

⁹ Rijksoverheid, Sturen op gebalanceerde internationalisering hogescholen en universiteiten, <https://www.rijksoverheid.nl/actueel/nieuws/2024/05/13/sturen-op-gebalanceerde-internationalisering-hogescholen-en-universiteiten> (13-05-2024)

The WIB and the TAO take into consideration demographic and labour market conditions of the study region, the uniqueness of the study programme and the international outlook of the higher education institution offering the programme. In doing so, both recognise the unique situation of border regions. The need to do so has been highlighted by the *Beleidskompas*, an assessment framework for new policy and legislation, as among others Cross-Border effects (*Grenseffecten*) is a mandatory requirement to test for new policies (as also advocated by ITEM). In its assessment, the Ministry of OCW acknowledges the potential border effects of the WIB (see Explanatory Memorandum, section 6.5).¹⁰ It is argued, however, that “the entry into force of the present bill does not change the possibility of carrying out daily activities, such as living, working, studying, and doing business across the border. While a border effect may theoretically exist in the region, in practice it may hardly affect daily life” (p.63). In addition, it is expected that the bill will affect international student mobility, in particular, motivations of German students to choose a study in the Netherlands. There will, therefore, certainly be border effects after the present bill enters into force, but these are “not expected to be heavily negative in nature” (p.63).

Higher education institutions and other stakeholders fear, however, that the uniqueness of border regions is not recognised sufficiently by the proposed legislation yet, and that the introduction of the WIB and TAO could have detrimental effects on the welfare/prosperity (*brede welvaart*), economy, labour market, and knowledge infrastructure in border regions. This becomes clear, for example from the online public consultation of the TAO, which took place from 28 May 2024 to 1 July 2024. More than half of the 39 reactions include references to border regions. Concerns include, for example, the arbitrary definition of border regions; that the presence of higher education institutions in regions like North- and Middle-Limburg could be jeopardised; and that the cooperation between higher education institutions in (cross-)border regions could be affected if, for example, the transition from a hbo-bachelor’s degree to a foreign-language wo-master’s degree that requires prior English language education is complicated.¹¹

For border regions and higher education institutions located in border regions like Maastricht University (UM), the question thus arises as to what the possible cross-border effects of the language requirements of the WIB are for border regions. The dossier analyses the importance of language regarding internationalisation and international students for cross-border regions and the alignment of the WIB with developments across the European Union and in neighbouring regions.

2. Objectives & Method

2.1. Ex-ante assessment

This dossier is an ex-ante analysis of the possible cross-border effects of the proposed WIB including the TAO based on (legal) desk research. It focuses on the possible effects of the proposed measures

¹⁰ Government of the Netherlands (2024). Aiming for a balanced internationalisation of universities and universities of applied sciences. Retrieved July 2024 from <https://www.government.nl/latest/news/2024/05/13/aiming-for-a-balanced-internationalisation-of-universities-and-universities-of-applied-sciences>

¹¹ See for example [Economic Board Zeeland](#); [Zuyd Hogeschool](#), [Maastricht University](#), [VISTA college](#), [municipalities of Maastricht](#), [Heerlen](#), [Sittard-Geleen](#), [Roermond](#), [Venlo](#) and the four Brightlands campuses.

regarding language on the cross-border region and how these can be different from non-border regions. In doing so, we aim to contribute to the current discussion of the bill and internationalisation of higher education in general from the perspective of the cross-border territories. At the time of finalising the report, the final text of the legislative bill – including the latest amendments – is not available yet. Also the political future of the bill is uncertain, as the government has fallen and new elections will be held. Therefore, this report aims to provide valuable insights and data on the topic, both for policymakers and for higher education institutions on internationalisation in a cross-border context.

It is beyond the scope of this dossier to discuss the relevance of the English language as an academic language, the role, and importance of international students in the regional functioning of universities, societies, and academia in general and the desirability of foreign-language education and/or the influx of international students in Dutch higher education. In addition, it is important to emphasise that the concept of the border region and the shrinking region should not be conflated. Nevertheless, there is some overlap between the two as border regions are often also shrinking regions, which face population ageing and decline.¹² Internationalisation, attracting and retaining international students are one way to mitigate these demographic and associated economic challenges. Negative population developments can partly be attributed to policies that are more focused on the *Randstad* than rural areas and border regions,¹³ leading to a greater divergence between more and less central regions in the Netherlands, including border regions. The content of this dossier thus needs to be placed in a broader context of government policies towards (border) regions more generally.

2.2. Demarcation of analysis: (cross-)border territory and research themes

2.2.1. The border and cross-border territory: South-Limburg and the Euregio Meuse-Rhine

As in previous ITEM Cross-Border Impact Assessments, we distinguish the concepts “border region” and “cross-border region/ territory”. A border region falls within the realms of one country that defines the border region’s interest from a more national or regional perspective. In the context of this study, Dutch national law (i.e., the WIB) acknowledges the special interest of border regions, which were initially defined as “25 km away from international border with a country that speaks another language”¹⁴. To make it more concrete, the geographic focus of this study is on the border region of South-Limburg, which is also part of a cross-border region, namely the Euregio Meuse-Rhine (EMR). The interests of the EMR are defined from a cross-border perspective, for example in its current Strategy “EMR 2030”.¹⁵ South-Limburg and the EMR are especially interesting to look at because it is a relatively densely populated and metropolitan Euroregion and there are three official languages spoken in the individual sub-regions: Dutch (in South-Limburg in the Netherlands and the Belgian Province of Limburg), German (in the Region of Aachen in Germany and the German-Speaking Community in Belgium) and French (in the Belgian Province of Liège). If higher education institutions located in South-Limburg (i.e., Maastricht University, Open University, Zuyd University of Applied

¹² Rli, RVS & ROB (2023). *Elke regio telt! Een nieuwe aanpak van verschillen tussen regio's*. Den Haag.

¹³ The advisory councils indicate “that border regions suffer from the [...] signalled 'macro perspective' on efficiency in national policy. There is a lack of targeted investment in structural solutions to specific bottlenecks that put residents of border regions at a disadvantage.” Ibid, p. 45.

¹⁴ AMvB toets anderstalig onderwijs consultatie, Art.6.15. Retrieved November 2024 from <https://www.internetconsultatie.nl/toetsanderstaligonderwijs/b1>

¹⁵ EGTS Euregio Maas-Rijn (n.d.). *EMR 2030*. Eupen.

Sciences, and Fontys University of Applied Sciences) have to limit programmes offered in foreign languages, this will likely have an impact on the border as well as the cross-border region. Specifically, it is expected to affect international student mobility from German- and French-speaking parts of the EMR to South-Limburg, and cooperation between universities in the EMR. There are more than 100,000 students in the EMR studying at five universities and several universities of applied science. Around 2,200 students in the EMR find themselves in a cross-border situation because they live, study or work in different sub-regions of the EMR.¹⁶

2.2.2. The Research Themes, Principles, Benchmarks, and Indicators of the Dossier

This dossier aims to assess the potential effects of the WIB and TAO on the Euregio Meuse-Rhine. In line with the well-established ITEM Cross-Border Impact Assessment methodology, we discuss the potential impact on three themes: 1) European integration; 2) Sustainable/ socio-economic development; and 3) Euregional cohesion (see Table 2). Regarding the theme “European integration” the question arises whether the proposed legislation is in line with free movement rights under EU law, and the EU policy objectives such as the European Education Area and European Research Area. With respect to the second theme “Sustainable/Socio-economic development” this dossier will establish whether the proposed measure will strengthen or weaken the position of higher education institutions in the EMR. In addition, it will compare whether accessibility of higher education and absorption capacity (e.g., in terms of housing) of (cross-)border regions differ with non-border regions. Finally, this dossier addresses key questions related to the third theme “Euregional cohesion” including whether or not the proposed measures will affect cooperation between higher education institutions in the EMR.

¹⁶ Büttgen, N., & Reinold, J. (2020). A Guide to Borderless Living and Working in youRegion Euregio Meuse-Rhine: Project brochure to the INTERREG-EMR project youRegion. Euregio Meuse-Rhine (EMR). https://youregion.eu/wp-content/uploads/2020/10/RZ_201013_YR_Brosch%C3%BCre_Digital.pdf

Table 2: Research themes, principles, benchmarks, and indicators for assessing the cross-border effects of the bill on 'Internationalisation in balance'

Principles	Benchmarks	Indicator
Theme: European Integration		
Internal market, free movement and non-discrimination European Education Area European Research Area European University Initiative	Everyone has access to higher education Equal treatment of Dutch and European nationals	What does the WIB mean for citizens in (cross-)border region in relation to access to higher education? Does the WIB comply with equal treatment of Dutch nationals and EU citizens? Does the WIB promote the cross-border mobility of students? Does the WIB promote European/ euregional cooperation in higher education?
Theme: Sustainable Development/ Socio-Economic Development		
International competition Euregional labour market and economy Free movement of persons	Competition of university at the border vs. not in border regions or on the other side of the border A 360-degree labour market and economy national vs. euregional (and the role of a university within the euregion) Cross-border solutions for housing	What effect will the WIB have on the prosperity and social economic development of border regions? What is the availability of Dutch-speaking teachers? What are the benefits of English and internationalisation in higher education for (cross-)border regions? What is the relevance of international students for the euregional economy? What are housing possibilities in border vs non-border regions?
Theme: Euregional Cohesion		
Improved cooperation between universities in the euregion Euregional cohesion between students, institutions and citizens Free movement of persons	Unhindered cooperation between universities Good language understanding in the euregion	Unhindered Euregional functioning of a university How do language requirements affect cross-border cooperation? What is the role of (English) language in education in the EMR?

3. Balanced Internationalisation Bill

This section elaborates on the Balanced Internationalisation Bill (*Wet internationalisering in balans, WIB*) as submitted to the House of Representatives on 8 May 2024. The proposed WIB amends the Higher Education and Scientific Research Act (*Wet op het hoger onderwijs en wetenschappelijk onderzoek (WHW)*), the Student Finance Act (*Wet Studiefinanciering 2000*) and the Education Supervision Act (*Wet op het onderwijstoezicht*).¹⁷

The main elements of the bill are language policy, conditions for offering foreign language education, and the introduction of a *numerus fixus*. The proposed changes in terms of language mainly concern Bachelor's and associate degree programmes as well as tracks (e.g., courses or specialisations) within these. The WIB stipulates that educational offerings be provided in Dutch for a minimum of two thirds of the study load.¹⁸ If more than a third of the total number of credits is taught in a language other than Dutch or the final examination of the programme/track is held in another language, programmes and tracks are defined as foreign-language programmes/tracks. Higher education institutions are required to get the Minister's approval for offering these (Art. 6.3), which depends on effectiveness in terms of regional and labour market conditions, the international uniqueness or positioning of a programme/track and considering the entirety of higher education facilities. Before the amendment Krul C.S., existing programmes and tracks offered in foreign language need to be approved by the Minister within nine months after the WIB coming into effect, following the same guidelines (Art. 6.4). Currently, the exact treatment of existing offerings in light of the TAO is still dependent on the amended bill expected in fall 2025. The consent to offer programmes and/or tracks in foreign languages (Art. 6.5a) can also be withdrawn again by the Minister.

New and existing educational offerings in foreign languages also need to comply with the overall language policy set out in Art. 7.2a. This implies that within six months after the WIB enters into force higher education institutions need to adopt a language policy and plan that clarifies on which grounds education is offered in a foreign language, how accessibility to foreign-language educational offerings is guaranteed for Dutch-speaking students, and how the overall quality of education is secured. In addition, this policy and/or plan needs to specify how higher education institutions that receive government funding commit to promoting the Dutch language skills of students in line with Art.1.3 para.6.

In addition, the WIB holds that higher education institutions may introduce a *numerus fixus* for students enrolling in a Master's programme for the first time in line with resources available for teaching (Art.7.54a). It is possible to limit the number of students who are not eligible for Dutch student financial aid in line with the Student Finance Act. Regulations for the selection process need to be defined and communicated in advance. If higher education institutions want to introduce a *numerus fixus* for Bachelor's or associate degree programmes, they are required to inform the Minister before 1 December preceding the academic year during which the quota is introduced.

Higher education institutions can furthermore introduce a *numerus fixus* for new enrolments in the event of an unexpected large increase in applications, a lack of teaching resources, and a serious risk

¹⁷ These are unofficial translations of Dutch legislative texts, made by the authors themselves.

¹⁸ For education in the Province of Friesland, where the official languages are Dutch and Frisian, this concerns education in Dutch or Frisian.

to the quality of education. The introduction of such a *numerus fixus* is limited to one year and needs to be set by 1 March before the start of the academic year during which the quota applies. If there is an unexpected increase in applications from students who are not eligible for Dutch student financial aid or do not have Surinamese nationality, and it might prevent other students from enrolling, the board can also set a limit on how many of these students are accepted. Quotas can also be introduced for Bachelor's and associate degree programmes if the supply of graduates is expected to exceed the demand of the labour market significantly (Art. 7.56).

Exemptions and the TAO

The explanatory memorandum also emphasises that these aspects are not final. The final assessment framework will be worked out in a policy rule. The Foreign Language Education Test (*Toets Anderstalig Onderwijs*; TAO) was published for consultation in May 2024. While the proposed bill aims to foster education in the Dutch language, there are exemptions foreseen on the 'two-third rule'. These are laid down in policy rules.¹⁹ There is a general exemption foreseen for courses whose provision in other languages is evidently effective, e.g. language courses and joint Bachelor's programmes. If the language of instruction at the collaborating institution is not Dutch, the need for non-Dutch in a jointly offered curriculum is deemed to be evident. For the exemption to be applicable, the Joint programme has to be accredited by the NVAO.²⁰

Next to these general exemptions, there are exemptions possible based on certain characteristics. As mentioned in the introduction, an important role for this is foreseen for the TAO. In the first draft of the WIB it was indicated that a programme or pathway may be provided in a foreign language if it is demonstrated that:

1. this fits within the institution's language policy; and
2. this is efficient in view of:
 - A. regional circumstances; or
 - B. labour market; or
 - C. international uniqueness; or
 - D. international positioning; and
3. there is room for it in relation to the higher education provision as a whole.

Regarding the 'region', 'labour market', 'international uniqueness' and 'international positioning' criteria, at least one of these four must always be met in full.

For border regions, the regional circumstances could be the most prominent exemption. At time of writing, the minister of OCW announced to move these criteria from the TAO to the WIB. Earlier, regarding the regional circumstances, the Explanatory Memorandum²¹ puts three cumulative characteristics to the forefront: location of the institution in a border- or shrinkage region, the interconnectedness of the institution with the region and the significant contribution of the programme to the region. Thus, the first two are targeted to the institution, while the latter is concentrated on the programme. A border region is defined as "programmes or courses offered at a

¹⁹ Ministeriële regeling toets anderstalig onderwijs & AMvB toets anderstalig onderwijs

²⁰ Ministeriële regeling toets anderstalig onderwijs

²¹ Nota van toelichting bij AMvB toets anderstalig onderwijs

location within 25 kilometres radius from the national border with a foreign language area". As shrinkage regions, nine focus areas are taken from earlier regional policies and programmes. These regions include for example Oost-Groningen, Parkstad-Limburg, Maastricht-Mergelland and Zeeuws-Vlaanderen. In fact, in many cases these regions are also located at national borders. The cumulative criteria of the embeddedness of the institution within the region, may in a border region for example appear by the choices that are in line with and recognised by (eu)regional partners and in the case the institution can show a reciprocal and sustainable relation with educational institutions in the cross-border region. Finally, the criteria of the significant regional contribution in border regions can be shown by explaining to what extent the knowledge infrastructure has a cross-border character and promotes cross-border cohesion. It can also be argued why foreign-language education is a better fit with the (eu)regional labour market. In the latter, it should be argued how the effectiveness of foreign-language training can be demonstrated.

How the exact TAO and exemptions will look like is at the time of writing still unknown. With the entrance of the (by time of finalizing the writing, again fallen) government Schoof, the minister of OCW made clear that the exemptions, also for border regions, should be applied in a restrictive manner by sharpening the wording. For example: "the fact that an institution is located in a shrinking region, or that a programme trains for a labour market shortage, is in itself insufficient to get permission for foreign-language education".²² As mentioned in the introduction, the discussion around the budget of OCW proposed again amendments to the TAO; specifically to shrinkage regions, that in many cases concern border regions. As reaction to the amendment, the minister of OCW has made clear that the aspect of regional circumstances will be moved from the TAO to the legislative text of the WIB itself. Here, a list of shrinking regions and neighbouring regions will be provided for delimitation. While regional circumstances are foreseen in the amended WIB, higher education institutions still will have to apply the TAO-assessment in case of foreign-language education.

Embedding regional circumstances in legal text: as foreseen in the Letter of 7 February 2025

The regional criteria from the TAO will be translated into the WIB. There will be a scope for the Article on regional circumstances, targeted at institutions located in a shrinking region or in the neighbourhood of a shrinking region. Regarding shrinking regions, coordination is foreseen with the governmental programme '*Nationaal Programma Vitale Regio's*' (National Programme Vital Regions). Regions of focus in this programme are: Kop van Noord-Holland, Noord- and Oost-Groningen, Zuidoost-Fryslân, Noard-Fryslân, Zuid- and Oost-Drenthe, Twente, Achterhoek, Noord-Limburg, Zuid-Limburg and Zeeuws-Vlaanderen. A delimitation of the definition 'proximity' is still under development. Together, the legislative amendment to the WIB should include a limitative list of regions. Regarding the regions, it is thus clear that an amendment will be made to the regional scope of the TAO as described earlier on. To what extent the other requirements of the regional criteria will still be applicable or not, is unclear.

²² Rijksoverheid, Kabinet maakt Nederlandse taal de norm en beperkt studiemigratie, <https://www.rijksoverheid.nl/regering/bewindspersonen/eppo-bruins/nieuws/2024/10/15/kabinet-maakt-nederlandse-taal-de-norm-en-beperkt-studiemigratie> (15 October 2024)

3.1 Other developments regarding the internationalisation of higher education

In addition to the proposed WIB and TAO, other developments have implications for the internationalisation of the Dutch higher education. These concern the international recruitment stop; measures for self-regulation introduced by Dutch universities; and major budget cuts in higher education announced by the new government.

Universities' measures for self-regulation

Reacting to discussions about the internationalisation of higher education in the Netherlands, acknowledging the associated challenges, and taking their contribution to Dutch society and language seriously, Dutch universities prepared several measures.²³ This proactive action is the result of extensive coordination between the higher education institutions, to show their willingness to cooperate with the Dutch government, to guarantee access and quality of higher education, and to prevent the introduction of radical measures that could seriously harm the Dutch higher education landscape, the labour market and economy. To reduce the number of international Bachelor's students, they plan to introduce enrolment quotas for English-taught degree programmes, while keeping Dutch-taught equivalents fully accessible. Offering preparatory years for international students to become eligible to studying at Dutch universities will be discontinued. In addition, they will identify foreign-language Bachelor's programmes that could be fully transitioned to Dutch and will not create new English-language Bachelor's programmes for the time being. Furthermore, they will promote Dutch language skills among students and staff. They continue the suspension of active recruitment at international fairs (see above). Universities will collaborate with local partners and employers to enhance the retention of international students, maximizing their contribution to Dutch society. In addition, they will jointly address housing shortages through the National Action Plan for Student Accommodation. The universities highlight that the implementation of these measures will require time, capacity and financial means.

In April 2025, the Dutch universities proposed their final package of self-management measures as alternative to the application of the TAO on the existing educational offer.²⁴ In their binding administrative agreements, the universities have agreed upon the following: the bachelor programme Psychology will be to a great extent transformed to the Dutch language, the remaining part will be bilingual by adding a Dutch track. Also, the *numerus fixus* will be maintained and coordinated across universities. Also in the cluster Economics and Business Economics, large bachelor programmes will be transformed to the Dutch language, Dutch track will be added and *fixi* will be put in place or sharpened. In this context, shrinkage- and border regions as well as sectors with shortages, will be exempt or relieved from these measures. All universities are committed to improve the Dutch language competencies, both for staff and students.

²³ Universiteiten van Nederland. Package of measures for self-regulation: strengthening the Dutch language and managing the intake of international students. Definitive version 5 February 2024. Retrieved November 2024 from <https://www.universiteitenvannederland.nl/files/publications/UNL-Packageofmeasuresforinternationalisation.pdf>

²⁴ Ibid.

At the end of 2022, Robbert Dijkgraaf, former Minister of OCW, following demands of the House of Representatives, wrote a letter to the higher education institutions in the Netherlands, with an urgent request to stop international recruitment activities.²⁵ This temporary freeze still holds, but there is room for customisation at the time of writing this report.²⁶ Nevertheless, as part of the self-regulation of the universities, the universities refrain from active recruitment during international fairs.

Budget cuts

In September 2024, the new government announced budget cuts in higher education of nearly 1 billion Euros.²⁷ These cutbacks are equivalent to eliminating one of the 14 universities in the Netherlands and will affect teachers, early-career researchers and key research funds. As a consequence, some universities have frozen hiring. In addition, the budget cuts will also impact students through either increasing tuition fees or introducing a slow-progress penalty for students who take longer to graduate. This might make pursuing higher education less accessible.²⁸ These budget cuts have been relaxed a bit after an agreement with parties from the opposition.²⁹

4. Trends in the internationalisation of higher education

This chapter brings together relevant information on current trends and practices in the Netherlands and across the border regarding the internationalisation of higher education and providing foreign-language education. This information focuses on the share of international students and language policies and practices.

4.1. The Netherlands

Trends in the internationalisation of Dutch higher education

The number of international students enrolled in Bachelor's programmes at Dutch higher education institutions grew continuously during the past decade (Table 3).³⁰ At the start of the academic year 2023/2024, 56,381 international students were enrolled in a Bachelor's programme at Dutch universities, accounting for 26 per cent of the entire Bachelor's student population (219,026) (Table

²⁵ NOS Nieuws. Kabinet: stop met werven buitenlandse studenten. <https://nos.nl/artikel/2457440-kabinet-stop-met-werven-buitenlandse-studenten> (22-12-2022)

²⁶ See also: <https://www.rijksoverheid.nl/onderwerpen/onderwijs-en-internationalisering/documenten/beleidsnotas/2025/04/25/antwoord-op-schriftelijke-vragen-van-heite-nsc-over-het-artikel-um-werft-toch-weer-buitenlandse-studenten>

²⁷ Matthews, D. (2024). Far-Right Parties Seek to Cut Billions of Euros from Research. *Nature*, Vol. 635, pp.15-16. Retrieved November 2024 from <https://www.nature.com/articles/d41586-024-03506-y>

²⁸ Observant. Response to budget: "Cabinet is shooting itself in the foot". <https://www.observantonline.nl/english/Home/Articles/id/62242/response-to-budget-cabinet-is-shooting-itself-in-the-foot> (19-09-2024).

²⁹ NOS. Coalitie en oppositie eens over onderwijsbegroting, desondanks kritiek. <https://nos.nl/artikel/2547982-coalitie-en-oppositie-eens-over-onderwijsbegroting-desondanks-kritiek> (11-12-2024).

³⁰ Universiteiten van Nederland. Internationale studenten. Retrieved November 2024 from <https://www.universiteitenvannederland.nl/onderwerpen/onderwijs/internationale-studenten>

4)³¹. These numbers formed an increase of 8 per cent compared to the previous academic year.³² Overall, numbers of international Bachelor's students at Dutch Universities more than tripled between 2015 and 2024 (Table 3).

Table 3: Trend international Bachelor's student enrolment, by origin (2015-2024)³³

	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024
EEA	14,264	16,760	19,939	24,153	27,462	31,489	35,823	39,949	43,232	43,410
European (Non-EEA)	427	585	754	1,029	1,397	1,883	3,094	3,471	3,887	4,141
Non-European	2,122	2,622	3,534	4,624	5,795	6,896	7,753	8,584	9,234	9,364
Unknown	21	17	14	16	14	19	18	22	28	23
Grand Total	16,834	19,984	24,241	29,822	34,668	40,287	46,688	52,026	56,381	56,938
Yearly increase		19%	21%	23%	16%	16%	16%	11%	8%	1%

The situation varies significantly across higher education institutions with the share of international Bachelor's students varying from 9 per cent (Wageningen University) to 63 per cent (Maastricht University) in 2023 (Table 4). In absolute terms, the University of Amsterdam hosted the most international Bachelor's students in 2023, namely 10,386, accounting for 36 per cent of their entire Bachelor's student population.

Most international students originate from the European Economic Area (EEA) (43,232; 77%) (Table 4). Also, here there are important differences between institutions in terms of students' origins and distributions of EEA compared to non-EEA students (Table 4; Figure 3). The international student population at Maastricht University, for example, is clearly dominated by European students (89%).³⁴ At three universities, the share of non-EEA/ non-European students is around one third (Wageningen University, University of Amsterdam, and Erasmus University Rotterdam). This may suggest that universities in non-border regions are more attractive to students from third countries, or different strategies are applied. It could also mean that a (significant) share of European students at universities in border regions, in fact comes from the border regions of the neighbouring Member States. Unfortunately, we do not have more precise information on the exact origin of international students for all Dutch universities. We will zoom more into the situation of Maastricht University below.

In the case of the University of Groningen (RUG), which just falls outside of the category of border regions as was envisioned in the TAO³⁵, because it is more than 25 km away from the German border,

³¹ and for 17 per cent of all 340,160 students enrolled in Bachelor's and Master's programmes combined

³² ROD-wo based on 1cijferHO, DUO/UNL,

<https://www.universiteitenvannederland.nl/onderwerpen/onderwijs/internationale-studenten>.

³³ ROD-wo based on 1cijferHO, DUO/UNL,

<https://www.universiteitenvannederland.nl/onderwerpen/onderwijs/internationale-studenten>.

³⁴ Note that this data from UNL gives a slightly different picture than the registration data we received from Maastricht University. See Table 6.

³⁵ Note that Groningen is one of the focus regions as part of the *Nationaal Programma Vitale Regio's* and thus the regional scope of the amendment to the WIB.

most German students enrolled at the university come from more than 200 km away.³⁶ The argument that most international students are sourced from the region therefore does not seem to hold at first sight in the case of Groningen, which is why the university does not seem to be very different from universities in the centre of the Netherlands. At the same time, even if German students choosing to study in Groningen lived more than 200 km away before enrolling at the university, for many of them, RUG could still be the nearest (Dutch) university, which makes it more similar to other higher education institutions in border regions. A possible explanation is also that the region around Groningen and across the border in Germany are less densely populated and that the next cities (e.g., Emden, Aurich, Oldenburg, Bremen) are more than 100 km away from Groningen. Also, regarding the stay rates of international students, RUG argues that it is more similar to universities in border regions than in non-border region. These could be indicators that the definition of border regions used by the WIB is chosen to narrow and does not reflect the realities of higher education institutions in peripheral regions.³⁷

³⁶ This is based on data that the University of Groningen shared with us.

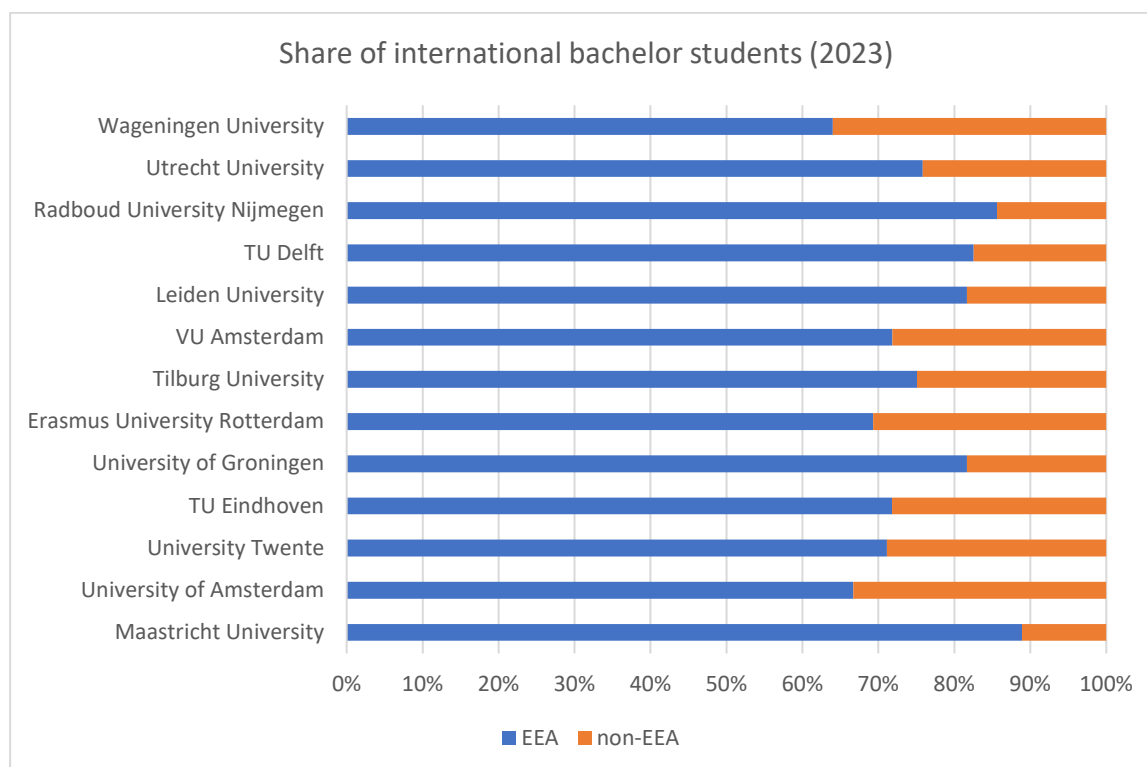
³⁷ Tweede Kamer, vergaderjaar 2023–2024, 36 555, nr. 6

Table 4: Enrolled Bachelor's students at Dutch universities (2023), sorted by share of international students³⁸

	ALL STUDENTS	INTERNATIONAL STUDENTS		EEA		NON-EEA	
	N	%	N	%	N	%	N
Maastricht University	15965	63%	10135	89%	9006	11%	1124
University of Twente	7351	37%	2749	71%	1952	29%	793
University of Amsterdam	28914	36%	10386	67%	6924	33%	3458
TU Eindhoven	8102	35%	2868	72%	2058	28%	809
University of Groningen	23544	28%	6570	82%	5364	18%	1204
Erasmus University Rotterdam	19564	26%	5171	69%	3583	31%	1587
Tilburg University	12984	26%	3332	75%	2502	25%	830
VU Amsterdam	19974	20%	3931	72%	2819	28%	1105
Leiden University	22128	19%	4117	82%	3361	18%	756
TU Delft	13538	17%	2269	83%	1872	17%	396
Radboud University Nijmegen	15573	11%	1746	86%	1494	14%	251
Utrecht University	25650	10%	2618	76%	1984	24%	632
Wageningen University	5739	9%	489	64%	313	36%	176
Grand Total	219026	26%	56381	77%	43232	23%	13121

Note: numbers do not always add up because information about the origin of few students is missing

³⁸ ROD-wo based on 1cijferHO, DUO/UNL, <https://www.universiteitenvannederland.nl/onderwerpen/onderwijs/internationale-studenten>.

Figure 3: Share of international Bachelor's students (2023)³⁹

Enrolment data for the academic year 2024/2025 show a 6 % decrease of international Bachelor's students at Dutch universities compared to the previous year.⁴⁰ For first year Bachelor's students from the EEA the decline even amounts to 9 per cent. The numbers vary per university: VU Amsterdam witnessed a 24% drop of first-year international Bachelor's students, Maastricht University an 11% decline in first-year Bachelor's students and RUG a 14% decline in first-year Bachelor's students.⁴¹

Zooming into the registration data of Bachelor's students in 2024⁴², the institution-specific differences on international students, the relative and absolute amounts as well as their diversification to EU and non-EU can be shown. In their article, Hooijen, Mertens & Cörvers (2025)⁴³ have classified the universities according to a certain profile (based on their Bachelor's student enrolment data).

³⁹ ROD-wo based on 1cijferHO, DUO/UNL, <https://universiteitenvannederland.nl/onderwerpen/onderwijs/internationale-studenten>

⁴⁰ Universiteiten van Nederland, Forse daling instroom internationale studenten. (11-02-2025). <https://www.universiteitenvannederland.nl/actueel/nieuws/force-daling-instroom-internationale-studenten>

⁴¹ Universiteiten van Nederland, beleidsbestand ROD-wo, gebaseerd op 1cijferHO, DUO/UNL, <https://www.universiteitenvannederland.nl/onderwerpen/onderwijs/internationale-studenten>

⁴² Ibid.

⁴³ Hooijen, I., Mertens, P. & Cörvers, F. (2025). Niet over grenzen, maar door grenzen heen: de student als structurele grensganger. *Vakblad Grensoverschrijdend Werken*.

Table 5: Registration data Bachelor's students to background in 2024 and profiling

University	Total	Total International (EU/non-EU) (% of total)	Non-EU (% of non-NL)	Profile
<i>Maastricht University</i>	4868	3554 (68.9%)	288 (8.1%)	Euregional rooted & European focus
<i>TU Delft</i>	3422	772 (22.6%)	89 (11.53%)	National rooted & European focus & international
<i>Leiden University</i>	5344	1266 (23.7%)	177 (13.98%)	National rooted & international
<i>University of Groningen</i>	6205	1699 (27.4%)	255 (15.01%)	National rooted & European focus & international
<i>Radboud University</i>	4039	407 (10.1%)	64 (15.72%)	Regional and national rooted
<i>TU Eindhoven</i>	2651	1373 (51.8%)	234 (17.04%)	Strong European focus & international
<i>VU Amsterdam</i>	4784	815 (17.1%)	143 (17.55%)	Regional rooted & international
<i>Tilburg University</i>	3744	936 (25%)	171 (18.27%)	National rooted & European focus & international
<i>Erasmus University Rotterdam</i>	5930	1871 (31.6%)	407 (21.75%)	International
<i>University of Twente</i>	2078	835 (40.2%)	209 (21.75%)	Strongly international
<i>University of Amsterdam</i>	7573	3136 (41.4%)	951 (30.33%)	Strongly international
<i>Wageningen University</i>	1346	163 (12.1%)	64 (39.26%)	National rooted & international
<i>Utrecht University</i>	6483	777 (12%)	541 (69.63%)	National rooted & very international

The table shows significant differences between universities. While for example, Utrecht University has relatively a small share of 'international' students, the share of non-EU students is significantly high. On the contrary, Maastricht University has a significant high share of 'international students', but very little of them are non-EU. The student population at Dutch universities is therefore not a case of one-size-fits-all.

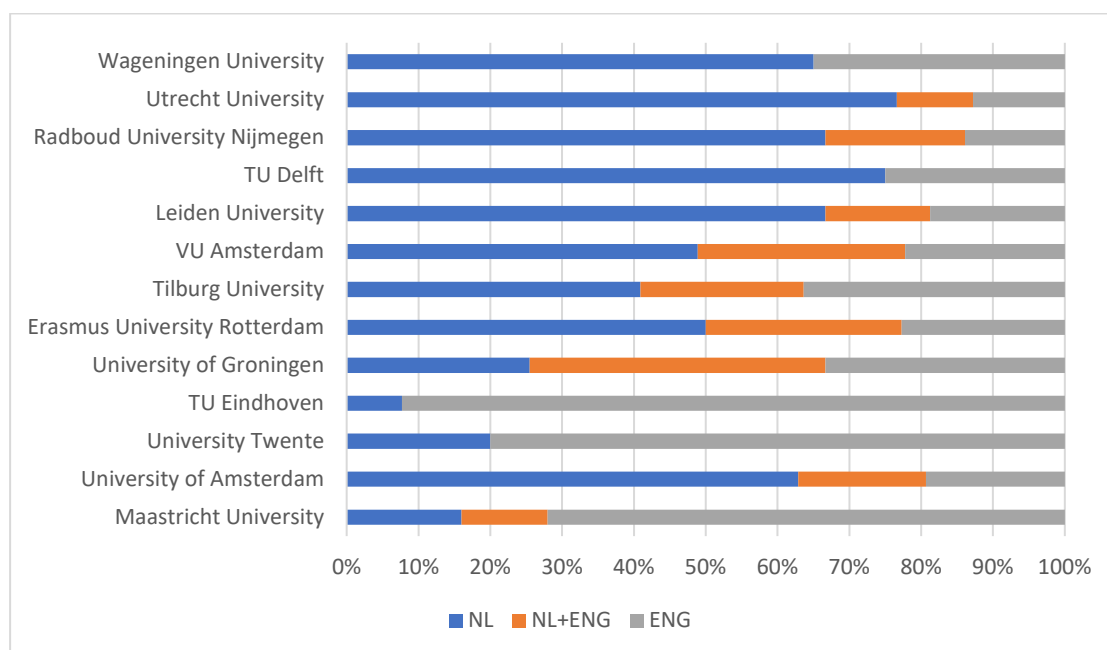
Language practices

In 2023, most Bachelor's programmes in the Netherlands were taught in Dutch. Fifty-two per cent were taught exclusively in Dutch, 30 per cent in English, and 18 per cent in Dutch and English. Programmes that were exclusively taught in English are mostly in technical and economic fields or in cross-sectoral programmes, for example at university colleges.⁴⁴ Programmes in the sectors of health

⁴⁴ Universiteiten van Nederland. Internationale studenten. Retrieved November 2024 from <https://www.universiteitenvannederland.nl/onderwerpen/onderwijs/internationale-studenten>

and law are mainly taught in Dutch. Again, there are significant differences across universities (Figure 4). Universities located closer to the border offer a larger share of English taught programmes (e.g., RUG, TU Eindhoven, Maastricht University, University Twente), which may not only be border specific, but also a result of the disciplines they are focusing on. TU Eindhoven and University of Twente have a strong technological educational offer, that is more often taught in English. If the WIB is introduced it can thus be affected that Dutch universities closer to the border will experience more challenges during the transition to more Dutch educational offers, also because of employing more international staff.⁴⁵ One exception here is Radboud University in Nijmegen, which, despite its proximity to the German border (even within the 25 kilometres of the TAO) and location in the Euregio Rijn-Waal, has comparatively few international students and English-taught programmes. In this respect, it shows more comparable figures to the centrally located Utrecht University. This is also related to the fact that Radboud University has not formulated a definitive vision and strategy on internationalisation, that includes the cross-border aspects, but rather position themselves as a regional university.⁴⁶ Furthermore, the numbers from *Universiteiten van Nederland* on the language of programmes as presented below does not exclude the fact that in so-called ‘Dutch programmes’ English courses are offered. This is also true for Radboud University, that also offers English-taught courses in the educational programme.

Figure 4: Language Bachelor's programmes



Maastricht University

Maastricht University (UM) calls itself the European university of the Netherlands. The European character is reflected by the institution's international – mostly European – student population and study programmes with a European focus.⁴⁷ In the academic year 2023/2024, almost 16,000 Bachelor's

⁴⁵ Universiteiten van Nederland (n.d.). Herkomst Personeel. Retrieved November 2024 from <https://www.universiteitenvannederland.nl/onderwerpen/personeel/herkomst-personeel>

⁴⁶ Based on a discussion and reflection, an international officer of Radboud University shared with us.

⁴⁷ Maastricht University (2021). The European university of the Netherlands. Strategic programme 2022-2026. Retrieved November 2024 from <http://www.maastrichtuniversity.nl/file/umstrategicprogramme2022-2026a4engpdf>

students were enrolled at UM, of which 63 per cent (10,135) came from abroad, mostly EEA countries (89%; 9,006) (Table 4). Compared to 2015, the absolute numbers of international students almost doubled. In relative terms, the share of international students grew gradually, from 52 per cent in 2015 to 63 per cent in 2023 (Table 6).

Table 6: Students enrolled at Maastricht University (2015-2024)

	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024
<i>All students</i>	15,861	15,980	16,594	17,172	17,984	19,709	20,981	21,124	21,843	22,178
<i>All Bachelor's students</i>	10,565	10,800	11,233	11,611	12,204	13,424	14,295	15,002	15,965	16,013
<i>International Bachelor's students</i>	5,478	5,882	6,310	6,567	6,906	7,775	8,396	9,080	10,135	10,392
<i>Share international Bachelor's students</i>	52%	54%	56%	57%	57%	58%	59%	61%	63%	65%

Preliminary figures show a 10 % decrease in first-year Bachelor's enrolments and a 5% increase in first-year Master's enrolments at Maastricht University in 2024. There is a slight increase in the share of Dutch first-years.⁴⁸ Maastricht University offers four Bachelor's programmes exclusively in Dutch, 18 Bachelor's programmes exclusively in English and three Bachelor's programmes in both languages (Figure 4).⁴⁹

As discussed above, relatively more European students are enrolled at Dutch universities in border regions, which suggests that a significant number of them comes from across the border. Based on 2024 enrolment data that Maastricht University provided us with, we can confirm this argument (Table 7), at least in the case of this university. There seems to be a strong euregional functioning, with about 50% of the students coming from within 100 km (despite land borders) and just below 70% with only the Netherlands, Belgium and, most notably, Germany.

Table 7: Maastricht University students' origin, 2024

Distance origin	Bachelor's students		Master's students		All students	
	Number	Share	Number	Share	Number	Share
< 100 km	6611	42.5%	4503	65.6%	11114	49.6%
Belgium	1596	10.3%	121	1.8%	1717	7.7%
Germany	1131	7.3%	134	2.0%	1265	5.6%
The Netherlands	3884	25.0%	4248	61.9%	8132	36.3%
> 100 km	8941	57.5%	2366	34.0%	11307	50.4%
Belgium	138	0.9%	21	0.3%	159	0.7%
Germany	1659	10.7%	295	4.3%	1954	8.7%
The Netherlands	1482	9.5%	712	10.4%	2194	9.8%

⁴⁸ Observant. Fewer first years for Maastricht University. <https://www.observantonline.nl/english/Home/Articles/id/62316/fewer-first-years-for-maastricht-university> (02-10-2024)

⁴⁹ Universiteiten van Nederland (n.d.). Internationale studenten. Retrieved November 2024 from <https://www.universiteitenvannederland.nl/onderwerpen/onderwijs/internationale-studenten>

Other Europe	4453	28.6%	936	13.6%	5389	24.0%
Non-Europe	1209	7.8%	402	5.9%	1611	7.2%
Total	15552	100%	6862	100%	22414	100%

Note: The numbers do not always add up because students can be enrolled in more than one programme at the same time. Among Master's students the share of students coming from < 100 km seems especially high because many of them already came for their Bachelor's degree and therefore did not have to move again/ already were in the region before starting their Master's degree.

4.2. Looking across the border

In this section, we review language policies and internationalisation strategies at higher education institutions across the border in Belgium and Germany. In addition, we provide an overview of the share and origin of international students at relevant higher education institutions in neighbouring countries. The purpose of this exercise is to establish the extent to which internationalisation of higher education hinges upon language practices and to understand trends in the internationalisation of higher education in neighbouring regions. For border regions, the interaction with neighbouring regions across the border is an important aspect to consider. In general, several figures show that internationalisation is occurring across all European Member States, including Germany and Belgium. In this respect, the Netherlands ranks number 7 in the OECD-list of share of international students in tertiary education in 2022 (Germany and Belgium are ranking 11 and 16 respectively).

Table 8: Share of international or foreign students, by level of tertiary education, and distribution of tertiary students, by selected fields of study and mobility status (2013 and 2022)⁵⁰; In per cent, selected OECD countries: top 5 plus the Benelux-countries and Germany and France.

Share of international or foreign students								
Bachelor's or equivalent		Master's or equivalent		Doctoral or equivalent		All tertiary		
2013	2022	2013	2022	2013	2022	2013	2022	
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	
International students								
OECD countries								
Australia	14	15	38	39	33	35	18	23
Austria	20	19	19	26	28	40	17	19
Belgium	8	7	16	17	38	25	10	10
France	8	7	13	14	40	36	10	9
Germany	4	7	12	18	7	23	7	12
Luxembourg	24	25	67	77	84	91	44	50
Netherlands	8	15	17	27	38	m	10	17
New Zealand	13	9	20	19	43	44	16	10
Switzerland	10	10	27	31	52	58	17	19
United Kingdom	13	15	36	43	41	41	17	22
EU25 total	5	7	9	14	16	23	6	8

Note: All tertiary also includes short-cycle programmes. See *Definitions and Methodology* sections for more information. Data and more breakdowns

1. Year of reference differs from 2013: 2015 for Croatia, Greece and Romania; and 2016 for Argentina and Colombia.

2. Year of reference differs from 2022: 2021 for Argentina and South Africa; and 2018 for Indonesia.

Source: OECD (2024). For more information see Source section and Education at a Glance 2024 Sources, Methodologies and Technical Notes (<https://doi.org/10.1787/889713400000>). Please refer to the Reader's Guide for information concerning symbols for missing data and abbreviations.

Belgium: Flanders

The language of instruction in higher education institutions in Flanders is Dutch.⁵¹ Under certain conditions, higher education institutions can introduce other languages of instruction in the Bachelor's, Master's, or graduate programmes. The language policy at Flanders with regard to the proportion of the programmes that could be taught in another language than Dutch is quite strict. Only 9 per cent of the Bachelor's programmes in Flanders can be taught in another language than Dutch.⁵² In Dutch-taught Bachelor's and Master's programmes 18,33 per cent and 50 per cent of the study load respectively may consist of foreign language courses.⁵³ If a greater share of a study programme is taught in another language, it is seen as a foreign-language programme and a Dutch-taught equivalent has to be introduced.⁵⁴

⁵⁰ OECD (n.d.) International student mobility. <https://www.oecd.org/en/topics/international-student-mobility.html>

⁵¹ Vlaamse Overheid (n.d.). Onderwijsstaal in Het Hoger Onderwijs. Taalwetwijzer. Retrieved December 2023 from <https://www.vlaanderen.be/taalwetwijzer/onderwijsstaal-in-het-hoger-onderwijs>

⁵² De Tijd (2025) 'Vlaanderen zet rem op verengelsing hoger onderwijs'. <https://www.tijd.be/politiek-economie/belgie/vlaanderen/vlaanderen-zet-rem-op-verengelsing-hoger-onderwijs/10596475.html> accessed May 2025.

⁵³ Article II.261 Codex Hoger Onderwijs.

⁵⁴ Braem, A. (2024). Hoger onderwijs kritisch over minder internationalisering in Vlaams regeerakkoord: 'Dit is kortzichtig'. Retrieved November 2024 from <https://www.veto.be/onderwijs/hoger-onderwijs-kritisch-over-minder-internationalisering-in-vlaams-regeerakkoord-dit-is-kortzichtig/345946>

Indeed, for quite some time, introducing a more flexible policy on the language of instruction in Flanders has been a subject of discussion.⁵⁵ This is also strongly advocated by the (former) rector of the biggest university of Flanders, the KU Leuven.⁵⁶ Currently, KU Leuven offers 6 of the in total 77 Bachelor programmes in the English language. Among the effects of this strict language policy, a reference should also be made to tenure-track faculty members who must demonstrate a Dutch competency of minimum B1 within 5 years in order to hold their position. This can be a barrier to attracting and retaining international students and academics in Belgium. The coalition programme of the new Flemish government aims at preventing further internationalisation of higher education, following developments in the Netherlands and other European countries.⁵⁷ For example, they announced to cut funding and be strict on providing exemptions to foreign-language courses without a Dutch equivalent. On the other hand, it has been argued that since the Dutch language competency in general is declining, more attention should be placed on offering higher education in Dutch. In the future, every foreign-language programme needs to have a Dutch equivalent, which is expected to further hamper attracting talent, and international cooperation in higher education as well as the offer of joint programmes and degrees as in the case of UNA Europa.⁵⁸ Nevertheless, in Flanders not only through regulatory policies but also through hiring international staff, mobility of international and non-Dutch speaking students and staff has been encouraged. Furthermore, no barrier as to numerus clausus has been placed on the international students and the tuition fees have been comparatively low which increases the appeal of Belgian universities.

International students at Flemish universities

At the beginning of the academic year 2023/2024, 30,748 (18%) of students enrolled at Flemish universities were international.⁵⁹ Most of them originated from outside the European Union (17,285, 56%). A small share of international students was enrolled in Dutch-taught Bachelor's, Master's or bridging programmes⁶⁰ (5,773, 19%). International students enrolled in Dutch-taught programmes are mainly from the European Union (4,699, 81%). 12,029 international students were enrolled in English-taught programmes, of which 4,103 are from the European Union (34%). 12,939 enrolled in programmes of which the language of instruction is unknown.

Specifically at (academic) Bachelor level, 7,575 (10%) students enrolled that did not have the Belgian nationality; of which 4,643 students had an EU nationality (61%) and 2,932 non-EU nationality (39%).

⁵⁵ ScienceGuide (2014). '18,33% Als Taalnorm' (2014). Retrieved January 2024 from <https://www.scienceguide.nl/2014/06/1833-als-taalnorm>

⁵⁶ See for instance the opening speech at the start of the academic year of 2023/2024:

https://www.kuleuven.be/communicatie/congresbureau/corporate-evenementen/opening-academiejaar/archief/2023-2024/copy2_of_toespraken-opening-academiejaar-2023-2024/speech-van-rector-luc-sels-opening-academiejaar-2023-2024

⁵⁷ Braem, A. (2024). Hoger onderwijs kritisch over minder internationalisering in Vlaams regeer-akkoord: 'Dit is kortzichtig'. Retrieved November 2024 from <https://www.veto.be/onderwijs/hoger-onderwijs-kritisch-over-minder-internationalisering-in-vlaams-regeerakkoord-dit-is-kortzichtig/345946>

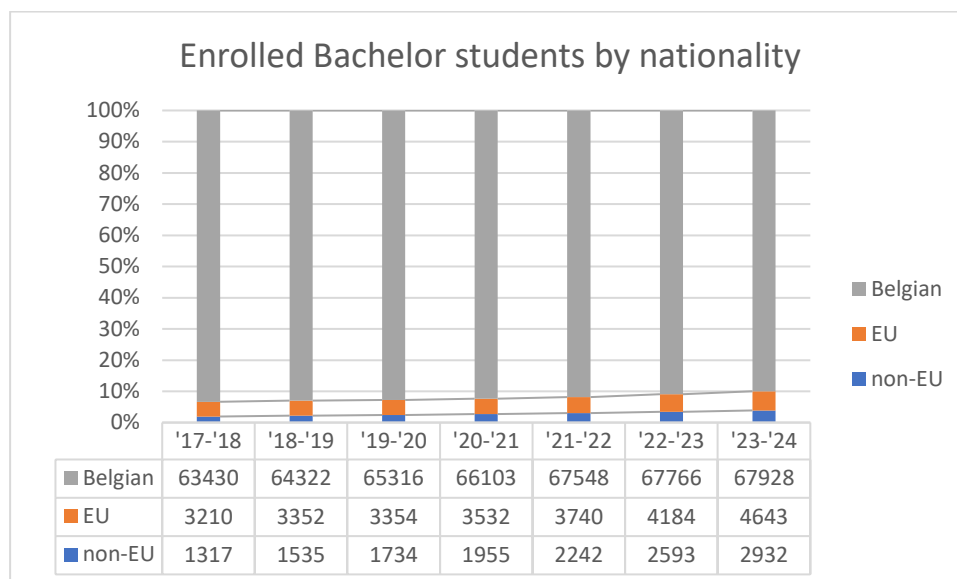
⁵⁸ Tibo, S. (2024). 'De Vlaamse regering hamert op excellentie, maar daarvoor is net méér internationalisering nodig'. Retrieved November 2024 from <https://www.veto.be/onderwijs/de-vlaamse-regering-hamert-op-excellentie-maar-daarvoor-is-net-meer-internationalisering-nodig/345711>

⁵⁹ Dataloep, Inschrijvingen – Hoger Onderwijs, <https://onderwijs-tableau.vlaanderen.be/t/EXTERN/views/DataloepInschrijvingenHogerOnderwijs/HOOVerzicht>

⁶⁰ A bridging programme (*Schakelprogramma*) equips students with a professional bachelor's degree with the required academic skills to follow a master's programme <https://www.kuleuven.be/english/education/educational-glossary/educational-glossary-b/bridging-programme>

Just more than half of the non-Belgian students were enrolled in an English-taught Bachelor programme. For the non-EU students specifically, this was 77%.

Figure 5: Enrolled Bachelor students by nationality in Flanders⁶¹



Hasselt University

In the academic year 2022/2023, 7,065 students⁶² were enrolled at Hasselt University, of which 15 per cent were international students⁶³. Six Master's programmes are taught in English (17%).⁶⁴ In addition, two English postgraduate certificates can be obtained from the institution.⁶⁵ There are no English-taught Bachelor's programmes. Hasselt University prides itself with 1,280 international partners "for education, research, and innovation".

Belgium: Wallonia

At higher education institutions in the French-speaking community of Belgium, the primary language of instruction and assessment is French, based on a 'Decree defining the landscape of higher education and the academic organisation of studies'.⁶⁶ Learning activities may also be conducted and assessed in another language under certain conditions. In the first cycle of studies, no more than 25 per cent of the credits can be offered in a language other than French. For Master's programmes, up to half of the credits may be delivered in another language, with the exception of credits required for the teaching Master's qualification. Programmes that are co-organised by multiple higher education institutions, including at least one outside the French-speaking Community, may also use other languages.

⁶¹ Dataloep, Inschrijvingen – Hoger Onderwijs, <https://onderwijs-tabelau.vlaanderen.be/t/EXTERN/views/DataloepInschrijvingenHogerOnderwijs/HOOVerzicht>

⁶² UHasselt (n.d.). Facts and Figures. Retrieved November 2024 from <https://www.uhasselt.be/en/about-hasselt-university/facts-and-figures>

⁶³ UHasselt (n.d.). UHasselt. Retrieved November 2024 from <https://www.uhasselt.be/en>

⁶⁴ These are the Masters of Interior Architecture, Management, Biomedical Sciences, Transportation Sciences, Statistics and Data science, and Energy Engineering Technology.

⁶⁵ These are the post-graduate certificates in "Building Beyond Borders" and "Innovation and Entrepreneurship in Engineering – Foundations" See <https://www.uhasselt.be/en/study/programmes?Opleidingstypes=25&OnderwijstaalEngels=true>

⁶⁶ Ministère de la communauté française (2023). Décret Du 07/11/2013 Décret Définissant Le Paysage de l'enseignement Supérieur et l'organisation Académique Des Etudes. [etaamb.openjustice.be](https://etaamb.openjustice.be/fr/decret-du-07-novembre-2013_n2013029625.html), article 75, Retrieved December 2023 from https://etaamb.openjustice.be/fr/decret-du-07-novembre-2013_n2013029625.html

Additionally, specialisation studies, postgraduate programmes, and professional development or other training courses can be conducted in languages other than French. For second-cycle studies, the Government may grant exemptions to higher education institutions for programmes deemed international in character, either due to the excellence of the scientific or artistic field or the specific nature of the programme.⁶⁷

Higher education institutions in the French Community may formulate their own international relations policy for education and research. These may concern international partnerships, networks, associations, joint programmes, etc.⁶⁸

International Students in French-speaking Belgium

Twenty-one per cent of Bachelor's and Master's students and 47 per cent of PhD students in French-speaking Belgium come from abroad.⁶⁹ We were not able to find more detailed statistics about the enrolment of international Bachelor's students at higher education institutions in French-speaking Belgium. Figures are not even available on the websites of the five universities in French-speaking Belgium (Université catholique de Louvain, Université libre de Bruxelles, Université de Liège, Université de Mons, and Université de Namur). A search of the available study programmes at the five universities has shown that study programmes offered in foreign languages (mostly English) are usually limited to the Master's level. It should be noted that engaging in internationalisation activities is less dependent on educational offers in foreign languages like English since French ranks fifth among the most spoken languages worldwide.⁷⁰

University of Liège

In 2023, the University of Liège hosted 27,678 students. Twenty-five per cent of all students were of foreign origin, representing 123 nationalities.⁷¹ There are 62 Masters (of 193 in total) that are taught fully in English. For four Bachelor programmes, foreign languages are promoted via language courses or courses in foreign languages (mostly English) but in general the language of instruction is French. Nevertheless, for example the Bachelor Economics and Management Sciences (*Sciences économiques et de gestion*) is focused on multilingualism through language courses with credits (English mandatory and Dutch, Spanish, Italian, and German as electives) and a bilateral course with the University of Hohenheim. Also, the Law Bachelor (*Droit*) has a strong focus on learning languages.

Finally, the University of Liège is part of the University of the Greater Region (UniGR), a unique cross-border grouping of universities. UniGR is formed by the universities of Kaiserslautern-Landau (D), Lorraine (F), Luxembourg (LU), Saarland (D), Trier (D), htw saar (D) and Liège (B).

⁶⁷ HELMo, 'Règlement Des Études et Règles de Fonctionnement Des Jurys 2022-2023'

⁶⁸ Eurydice (n.d.). Other dimensions of internationalisation in higher education. Retrieved November 2024 from <https://eurydice.eacea.ec.europa.eu/national-education-systems/belgium-french-community/other-dimensions-internationalisation-higher>

⁶⁹ Study in Belgium (n.d.). Higher education in French-speaking Belgium. Retrieved November 2024 from <https://www.studyinbelgium.be/en/higher-education-french-speaking-belgium>

⁷⁰ Statista (2024). The most spoken languages worldwide in 2023. Retrieved November 2024 from <https://www.statista.com/statistics/266808/the-most-spoken-languages-worldwide/>

⁷¹ L'Université de Liège (n.d.). Chiffres-Clés. Retrieved December 2023 from https://www.uliege.be/cms/c_9038278/fr/presentation-longue-chiffres-cles

Germany: North-Rhine Westphalia

In general, Germany wants to continue working on the further internationalisation of higher education.⁷² On the German federal (*Bund*) level, the so-called *Hochschulrahmengesetzes* regulates a wide variety of matters when it comes to university education.⁷³ This is a framework act on higher education law enacted to regulate the higher education system in the Federal Republic of Germany. Since academic sovereignty in Germany lies with the federal states and the corresponding details are regulated in the state higher education acts, the federal government was only allowed to make use of its framework legislative competence.

Art. 27, para 1 of this act stipulates - in terms of general admission requirements for students – as follows: “Every German within the meaning of Article 116 of the German Constitution shall be entitled to study at the university of his or her choice if he or she can provide evidence of the qualifications required for the course. Nationals of another Member State of the European Union shall be deemed equivalent to Germans if they can provide evidence of the language skills required for the course of study. Obstacles to admission that are due to the applicant's personal circumstances and do not relate to qualifications are regulated by state law.” A certain level of language skills is thus required, leaving it open to what is required for the given course of study. This does, hence, not necessarily be German (can be English instead).

International students at German higher education institutions

In the winter semester 2022/2023, Germany ranked third among the top destination countries of international students in terms of absolute numbers, overtaking Australia for the first time.⁷⁴ In total, there were 367,578 international students enrolled at German higher education institutions, accounting for 13 per cent of all students in Germany.⁷⁵ The share of international students at university is slightly higher than at universities of applied sciences (14% and 10% respectively). Most international students (44%) were enrolled in Master's degrees (Table 9). Engineering is the most prominent field of education among international students (42%), followed by law, economics and social sciences (25%).⁷⁶

Table 9: International students by type of degree and university in the winter semester 2022/2023⁷⁷

Type of degree	All universities		Universities		Universities of applied sciences	
	N	%	N	%	N	%
Bachelor's degree	132,534	36	66,089	26	66,445	57
Master's degree	160,306	44	118,028	47	42,278	37
Doctorate	30,025	8	29,938	12	87	<1
Other type of degree	19,176	5	17,771	7	1,405	1
Not studying for a degree	25,537	7	20,046	8	5,491	5

⁷² see <https://www.scienceguide.nl/2023/11/duitsland-wil-het-hoger-onderwijs-en-de-wetenschap-verder-internationaliseren/> (last access date: 21 December 2023).

⁷³ Bekanntmachung der Neufassung des Hochschulrahmengesetzes
Vom 19.01.1999 (BGBl. I 1999,3, S. 18), zul. geänd. durch Gesetz vom 15.11.2019 (BGBl. I 2019,40, S. 1622), see <https://www.gesetze-im-internet.de/hrg/>.

⁷⁴ DAAD and DZHW (2023). Wissenschaft Weltoffen 2023. Retrieved November 2024 from https://wissenschaft-weltoffen.de/content/uploads/2023/09/wiwe_2023_web_bf_en.pdf

⁷⁵ DAAD and DZHW (2024). Wissenschaft Weltoffen 2024. Retrieved November 2024 from https://www.wissenschaft-weltoffen.de/content/uploads/2024/11/wiwe_2024_web_en_nBF.pdf

⁷⁶ Ibid.

⁷⁷ Source: German Federal Statistical Office; DZHW calculations

Total	367,578	100	251,872	100	115,706	100
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As of July 2024, Germany offered 2,175 study programmes primarily taught in English, making up almost 10 per cent of all available programmes. Over the past 15 years, the number of English-taught programmes has grown more than fivefold. Currently, nearly all German universities provide degree programmes in English. The fields of business, administration, and law (26%), mathematics and natural sciences (26%), and engineering (18%) dominate, accounting for 70% of these programmes. Preliminary data suggests that half of the international students in Germany are enrolled in fully English-taught programmes. Another 19 per cent participate in programmes combining English and German instruction, while 31 per cent study in exclusively German-taught courses. The important role of German in German higher education makes sense given the language's prominent role in Europe and the world. German is the most spoken language in Europe and the 12th most spoken language world-wide.⁷⁸

There are significant differences across federal states (see Table 10). In absolute terms, North Rhine-Westphalia (NRW) hosted most international students in the winter semester 2022/2023, accounting for 11 per cent of the state's entire student population.⁷⁹

Table 10: International students by federal state in the winter semesters 2017/18 and 2022/23⁸⁰

Federal state	Winter semester 2017/18		Winter semester 2022/23		Change in %
	N	%	N	%	
Baden-Wuerttemberg	37,409	10	35,846	10	-4
Bavaria	38,650	10	61,379	15	59
Berlin	31,176	17	40,825	21	31
Brandenburg	6,628	13	9,644	19	46
Bremen	4,498	12	5,752	15	28
Hamburg	9,311	9	12,955	11	39
Hesse	23,504	9	29,458	12	25
Mecklenburg-Western Pomerania	3,155	8	3,632	10	15
Lower Saxony	17,717	9	21,235	11	20
North Rhine-Westphalia	64,307	8	78,543	11	22
Rhineland-Palatinate	10,194	8	13,947	12	37
Saarland	3,631	12	4,211	14	16
Saxony	15,199	14	17,125	16	13
Saxony-Anhalt	6,475	12	9,476	16	46
Schleswig-Holstein	3,799	6	4,553	7	20
Thuringia¹	6,349	13	18,997	14	199
Total	282,002	10	367,578	13	30

⁷⁸ Alumniportal Deutschland (2021). *Is German disappearing as a language of science?* Retrieved 28 January 2025 from <https://www.alumniportal-deutschland.org/en/magazine/science-research/german-as-a-language-of-science/>

⁷⁹ DAAD and DZHW (2024). Wissenschaft Weltoffen 2024. Retrieved November 2024 from https://www.wissenschaft-weltoffen.de/content/uploads/2024/11/wiwe_2024_web_en_nBF.pdf

⁸⁰ Source: Federal Statistical Office; DZHW calculations

Note: The significant increase in Thuringia is mainly due to the relocation of the headquarters of the "IU International University" from North Rhine-Westphalia to Thuringia.

RWTH Aachen University

In the winter semester 2023/2024, there were in total 45,284 students enrolled at RWTH Aachen University, including 14,437 (32%) international students from 141 countries.⁸¹ RWTH aims to be one of the best universities of science and technology in Europe. The top origin countries of international students are China, India, and Turkey. It is not clear how international students are distributed across Bachelor's and Master's degree programmes.⁸²

The default language of instruction in all Bachelor's and Master's courses at RWTH is German. There are with only a few exceptions.⁸³ Of all 73 available Bachelor's programmes, 65 are exclusively taught in German. The remaining eight are offered in German and English. Of all 113 Master's programmes, 66 are exclusively taught in German, 32 in English, three in German or English, and 12 in both languages. Students must prove they have the required language skills for their chosen course of study, usually with a recognised language certificate. Depending on their previous education, students may be exempted from this requirement. The legal basis in North Rhine-Westphalia for providing proof that students fulfil the required language skills is § 49, paragraphs 8 and 10 of the current editions of the Higher Education Act of North Rhine-Westphalia (*Hochschulzugungsgesetz*).⁸⁴

RWTH Aachen has adopted an Internationalization Strategy 2025.⁸⁵ One of the aims is the internationalization of education at RWTH, resting on three pillars: international programs taught at RWTH, study abroad periods and internationalization of the curriculum. Here, English-taught international programs are promoted, as well as English-taught courses at Bachelor's level in the path towards an English-taught Master's programme. In this respect, the Strategy defines the aim to create incentives for faculties to establish English-taught courses at Bachelor's level in all programs of at least 30 credit points.

Summary

In sum, it seems that higher education institutions in neighbouring regions are also engaging in internationalisation. In this respect, the recent German intentions to increase internationalisation seems the most prominent one. Despite these efforts, they mostly offer education in their official languages (Dutch, French, and German) and foreign-taught degree programmes are less common. It is important to note, however, that a substantial proportion of international students are likely enrolled in English-taught Master's programmes, and that French and German are spoken by significantly more

⁸¹ RWTH Aachen University (n.d.). Facts and Figures. Retrieved November 2024 from <https://www.rwth-aachen.de/cms/root/Die-RWTH/Profil/~enw/Daten-Fakten/lidx/1/>

⁸² RWTH Aachen (2024). Figure of Tables 2023. Retrieved November 2024 from <https://www.rwth-aachen.de/cms/root/Die-RWTH/Profil/~enw/Daten-Fakten/lidx/1/>

⁸³ <https://www.rwth-aachen.de/cms/root/studium/vor-dem-studium/zugangsvoraussetzungen/~zwyn/sprachkenntnisse/?lidx=1> (last access date: 21 December 2023).

⁸⁴ https://recht.nrw.de/lmi/owa/br_vbl_detail_text?anw_nr=6&vd_id=14567.

⁸⁵ RWTH Aachen, Internationalization Strategy 2025. <https://www.rwth-aachen.de/cms/root/die-rwth/profil/~bure/internationalisierung/>

individuals globally than Dutch is. This can also be supported by the fact that the share of international students enrolling in Dutch-taught programmes in Flanders is relatively low.

4.3. Euregional practices and examples

The official languages in the EMR are Dutch, German, and French. The recent report of the Cross-Border Housing Monitor for the Euregio Meuse-Rhine gives also more information on the demographics of the EMR.⁸⁶ The following table is retrieved from the 2023 report and gives an overview of the population of the EMR and its respective partner regions. The table also shows that the Dutch province of Limburg is the only region with a population decrease over time. In the forecasts, the regional development also shows a negative trend for Dutch Limburg, while the other regions face a modestly increasing predicted trend.⁸⁷ Belgian Limburg is also facing a small increase, not comparable to Liège and Region Aachen.

Assuming that the majority of residents in each sub-region of the EMR speaks the region's official language, it can be expected that around 40 per cent of the population in the EMR speak Dutch/Flemish as a native or second language.⁸⁸ Given the population foresight, the significance of the Dutch language in the EMR will likely decline.

⁸⁶ R. Vaessens, R. van Zandvoort, S. Paffen & L. Geurten, *Cross-border housing monitor*, January 2023.

⁸⁷ Cross-border housing monitor, p. 17 & 18.

⁸⁸ Own calculation based on the share of Dutch and Belgian provinces of Limburg in the total of the EMR.

Table 11: Population characteristics per district in the EMR regions (1 January 2022)

EMR region	District	Population (1/1/2022)	Development (10 years annual avg)	Development % (10 years annual avg)
Ostbelgien	Bezirk Verviers	78,604	248	0.3%
	Total	78,604	248	0.3%
Limburg (BE)	Arr. Hasselt	424,190	1,995	0.5%
	Arr. Maaseik	254,645	918	0.4%
	Arr. Tongeren	207,116	742	0.4%
	Total	885,951	3,655	0.4%
Limburg (NL)	Midden-Limburg	135,501	198	0.1%
	Zuid-Limburg	594,047	-1,317	-0.2%
	Total	729,548	-1,118	-0.2%
Liège	Arr. Huy	114,942	521	0.5%
	Arr. Liège	624,524	1,178	0.2%
	Arr. Waremme	83,012	575	0.7%
	Arr. Verviers	209,907	237	0.1%
	Total	1,032,385	2,511	0.2%
Region Aachen	Düren	266,771	825	0.3%
	Euskirchen	194,701	690	0.4%
	Heinsberg	258,306	1,015	0.4%
	StädteRegion Aachen	556,673	1,515	0.3%
	Total	1,276,451	4,044	0.3%
Total		4,002,939	9,340	0.2%

In a study of 2021, Basche investigated whether mental distance varies depending on different regional constellations with regard to official languages and centre–periphery relations, while taking into account individuals' knowledge of foreign languages and sociodemographic characteristics.⁸⁹ He concludes that there is indeed a positive relationship between language and the mental perception of a certain region, while this can be overruled by the status of a certain place (e.g., Aachen as centre versus peripheral). In contrast, he found that the better the knowledge of the English language is the higher the cumulative mental distance is. As an explanation, Basche supposes that this result may indicate that those who speak English fluently might be more strongly oriented to the global and cosmopolitan than to the cross-national regional level. He concludes with the recommendation to actively promote skills in neighbouring languages at both national and European levels to noticeably foster cross-border interactions.

Indeed, language was also found a relevant factor for the retention of migrant graduates in the Euregio Meuse-Rhine.⁹⁰ Hooijen et al. (2017) found that a relatively larger share of prospective graduates who

⁸⁹ Basche, H. (2021), Exploring Determinants of 'Mental Distance' in Cross-Border Contexts. Tijds. voor econ. en Soc. Geog., 112: 288-303. <https://doi.org/10.1111/tesg.12477>

⁹⁰ Hooijen, I., Meng, C., Reinold, J. & Siegel, M. (2017) Competition for talent: retaining graduates in the Euregio Meuse-Rhine, European Planning Studies, 25:12, 2212-2231, DOI: 10.1080/09654313.2017.1354976

intent to remain in the EMR considers proficiency in the official language as important. It is, however, a combination of several *hard* and *soft* factors that influence a decision to stay or leave.

Currently, euregional languages are promoted via initiatives such as the INTERREG Euregio Meuse-Rhine EMRLingua project. The focus is to foster the education of neighbouring languages at secondary schools. In the framework of this project, research was conducted about investments in the education of neighbouring languages. Geographical proximity does not automatically lead to investment in neighbouring languages, and it is important to embed a multilingual language policy within the school curricula not only from the perspective of practical needs but also due to political-ideological motives. Also, the author emphasises that an increase in the affinity with the neighbouring languages would impact the mobility of (eu)regional students' mobility and the cooperation among schools over time.⁹¹

Cross-border initiatives in higher education

Aachen Maastricht Institute for Bio-based Materials

The Aachen Maastricht Institute for Bio-based Materials (AMIBM) is a cross-border research institute dedicated to advancing bio-based materials. It is a collaboration between Maastricht University, RWTH Aachen University and Fraunhofer IME. It is based at the Brightlands Chemelot Campus in Geleen in Dutch Limburg, with a branch office in Germany. The institute fosters collaboration between academia and industry, creating synergies that drive innovation. AMIBM also offers several educational programmes. On Bachelor's level, these include the Maastricht Science Programme, Circular Engineering, Business Engineering, Biomedical Sciences and Regenerative Medicine and Technology. Master's programmes include Bio-based Materials, Biomedical Sciences, Imaging Engineering and Health Food Innovation Management. All programmes are taught in English.⁹²

The AMIBM supports regional development by enhancing the knowledge infrastructure and advancing Limburg's position as a leader in bio-based materials.⁹³ Before its establishment, bio-based materials research and education in Limburg was limited in scope. AMIBM has since built critical mass in this field through collaboration with RWTH Aachen University and Fraunhofer IME, alongside the development of advanced technical infrastructure. This has strengthened the region's research capabilities and visibility. The institute also enriches education, providing students with research and industry-focused training, ensuring a well-qualified workforce remains in the region to support its economic and scientific growth.

AMIBM enjoys a high level of international visibility both academically and in industry thanks to its success in acquiring third-party funding, publications and spin-offs. RWTH and Maastricht University (Netherlands) have jointly created an excellent infrastructure with the participation of numerous professorships on both sides.⁹⁴

⁹¹ Hovens, D. (2023). 'Verbinding Door Onderwijs in Een Grensregio'. <https://crossborderitem.eu/wp-content/uploads/Onderzoeksrapport-EMRLingua-Rapport-2.pdf>

⁹² Maastricht University (n.d.). AMIBM. Education. Retrieved November 2024 from <https://www.maastrichtuniversity.nl/research/amibm/education>

⁹³ Maastricht University (n.d.). AMIBM. Impact. Retrieved November 2024 from <https://www.maastrichtuniversity.nl/research/amibm/impact>

⁹⁴ RWTH Aachen University (2024). Internationalisierungsreport 2024. Retrieved November 2024 from <https://www.rwth-aachen.de/cms/root/Die-RWTH/Profil/~bure/Internationalisierung/lidx/1/>

Inspired by the success of AMIBM, AMICARE (Aachen-Maastricht Institute for CardioRenal Disease) was founded in 2022. AMICARE brings together researchers from Maastricht UMC+, Maastricht University and RWTH Aachen University to disentangle the relationship between cardiovascular problems and kidney disease.⁹⁵ While AMICARE does not offer education, it is a good example of the impact successful cross-border cooperation in higher education and research can have.

Transnational University Limburg (tUL)

This unique collaboration established in 2001 by the Flemish and Dutch governments brings together Hasselt University in Belgian Limburg and Maastricht University in Dutch Limburg. Degrees offered by tUL on the campus in Hasselt include Computer Science (Dutch-taught Bachelor's and Master), Statistics (English-taught Master), Biomedical/ Molecular Life Sciences (Dutch-taught Bachelor's and Master, English-taught Master)⁹⁶. In addition, the tUL collaborates with KU Leuven to offer Law degrees (Dutch taught Bachelor's and Master's degree) in Hasselt, Campus Diepenbeek. Degrees offered as part of tUL in Maastricht include the English-taught Master's degrees Artificial Intelligence, Biomedical Sciences, Data Science for Decision-Making.⁹⁷

At the beginning of the academic year 2023-2024, 19 per cent of all students enrolled in tUL degrees in Belgian Limburg were international students. Most of them were enrolled in English-taught Master's degrees, where the share of non-Belgian amounts to 42 per cent. In Dutch-taught Bachelor's degrees, only 7 per cent of students were international, in Dutch-taught Master's degrees, the share of international students was even smaller, namely 5 percent.⁹⁸ In Dutch-taught programmes, significantly more European international students are enrolled, while in English-taught programmes, non-Europeans outnumber European students.

Relevant developments: Trinational educational initiative and the Einstein Telescope

Next to existing initiatives, there are also some recent developments that are relevant to this dossier. First, the five universities (Open University, Maastricht University, RWTH Aachen, ULiège, UHasselt) located in the Euregio Meuse-Rhine have started an Interreg project to initiate a trinational educational project in the field of circular sciences. It should initiate a cross-border curriculum, probably by cooperating in the exchange across existing courses. The project will start as of September 2025. The initiative is politically supported by the university's rectors and regional authorities.⁹⁹ ITEM has great experience with Interreg projects, both in participating and from a research point of view¹⁰⁰,

⁹⁵ Maastricht University (2022). AMICARE: cross-border research on the relationship between heart failure and kidney disease. Retrieved November 2024 from <https://www.maastrichtuniversity.nl/news/amicare-cross-border-research-relationship-between-heart-failure-and-kidney-disease>

⁹⁶ Transnationale universiteit Limburg (n.d.). Opleidingen. Retrieved November 2024 from <https://tul.edu/2tulschools/>

⁹⁷ Maastricht University (n.d.). Transnationale universiteit Limburg. Retrieved November 2024 from <https://www.maastrichtuniversity.nl/transnationale-universiteit-limburg-faq>

⁹⁸ Vlaanderen (2024). Inschrijvingen Hoger Onderwijs. Retrieved November 2024 from <https://onderwijs-tableau.vlaanderen.be/t/EXTERN/views/DataloepInschrijvingenHogerOnderwijs/HOOVerzicht?%3Aembed=y&%3AisGuestRedirectFromVizportal=y>

⁹⁹ See for example the minutes of the meeting of the EGTC EMR of 27 November 2024.

<https://limburg.bestuurlijkeinformatie.nl/Document/View/7cb52351-9799-4214-acb5-c1530adc4b34>

¹⁰⁰ In the project Crossquality, ITEM, with UHasselt, ULiège and RWTH Aachen, did research into the quality of cooperation in Interreg projects. See: <https://crossborderitem.eu/en/projects/crossquality-assessing-the-quality-of-cross-border-cooperation/>

as well as with setting-up cross-border curricula¹⁰¹. While the euregional motto is to speak in your own mother language, the practical reality often is that the English language is used in euregional projects and cross-border cooperation.

The second relevant development is the Einstein Telescope. The area of the EMR is one of the candidates for this underground observatory for the measurement of gravitational waves. The observatory should be a world-class facility that enables research into for instance the birth process of black holes, the structure of neutron stars, and the nature of the universe immediately after the Big Bang. For the socio-economic impact of such an observatory for the region, comparisons are often made to CERN in Geneva. It can boost the creation of jobs and attract talent to the region. As it is a scientific project, there is of course also a clear link with the educational institutions in the EMR and beyond. In case the Einstein Telescope will be located in the EMR, it may be expected that more international talent will be attracted to the educational institutions. Despite that, the Dutch government made the Einstein Telescope recently a national priority.¹⁰²

Summary

The research reviewed in this section highlights the importance of proficiency in local and neighbouring languages, practical examples of euregional cooperation in higher education show that the language used is more often English as lingua franca. Nevertheless, euregional languages do play an important role for the stay rate of international students in the EMR. There seems to be a certain ‘pull and push’ factor, where English is attractive – both for national, international and euregional students – but can also act as a push when euregional language competencies are insufficiently promoted and developed over time.

While cooperation between Dutch and Belgian Limburg may be less affected if the WIB is introduced, moving to more education in Dutch could pose a serious risk to the future of the AMIBM, as leading researchers involved in teaching the institute’s Bachelor’s programmes unlikely speak Dutch. The same applies to the Einstein Telescope, that will most likely attract international students and talent as well to the region. It is explicitly the aim to connect the Einstein Telescope to the educational offer in the region. It is also questionable to what extent leading researchers and teachers in the field are interested in learning Dutch, as it is not a leading language in international education and research.

5. Evaluation of the European Integration Theme

The European Union promotes transnational cooperation on research, education, and innovation through different initiatives in recent years.¹⁰³ This includes the European Education Area, and the

¹⁰¹ For example in the FOCI-project on a European Degree Label (<https://crossborderitem.eu/en/projects/foci-future-proof-criteria-for-innovative-european-education/>) and the YUFE Joint Bachelor Programme (<https://crossborderitem.eu/en/projects/legal-aspects-of-setting-up-a-yufe-joint-bachelor-program/>).

¹⁰² ET-EMR, Government of the Netherlands: Einstein Telescope is national priority. <https://www.einsteintelelescope-emr.eu/en/2025/02/11/government-of-the-netherlands-einstein-telescope-is-national-priority/>

¹⁰³ European Commission. (n.d.). *Higher education initiatives | European Education Area*. Retrieved December 11, 2023, from <https://education.ec.europa.eu/education-levels/higher-education/about-higher-education>

European Research Area. Amongst other initiatives are the European Universities Alliances¹⁰⁴, and Erasmus+¹⁰⁵. The EU also participates in the Bologna process, an intergovernmental initiative, which aims to facilitate mutual recognition and comparability of study periods and qualifications among the Member States.¹⁰⁶ Recently, on 27th March 2024, the European Commission adopted a higher education package consisting of three initiatives aiming to foster deeper transnational cooperation among higher education institutions across the EU. Next to proposals on quality assurance processes and automatic recognition of qualifications in higher education, this includes a blueprint for a European degree. With a 'European degree', the Commission aims to facilitate cooperation of universities in different Member States in developing innovative, transnational joint programmes and/or joint degrees.¹⁰⁷

Considering the initiatives of the European Union in creating alliances and cooperation among higher education institutions and promoting European values and education mobility, it is imperative to evaluate these objectives against the Dutch proposal on internationalisation. As stated in the previous sections, the WIB stipulates that undergraduate programmes be provided in Dutch for a minimum of two thirds of the study load. While this shift is expected to regulate the overall number of international students opting for the Netherlands as a destination for associate or Bachelor's programmes, it is essential to assess the proposal against EU policy objectives and the principles of the free movement and internal market.

Indeed, central to these European initiatives are the basic principles enshrined in the treaties of the European Union, namely the free movement rights attached to EU citizenship. Education is a policy area where the EU only has a competence to support, coordinate and supplement the Member States.¹⁰⁸ Yet, the Member States must comply with the rights associated to internal market (shared competence): the rights to free movement. Some scholars have suggested that pursuant to case law of the Court of Justice (CJEU) the mobility of students constitutes a 'fifth freedom'.¹⁰⁹ In its report on the internal market that has prominent policy attention, also Letta held a plea for introducing a fifth freedom of research and education.¹¹⁰ It should be evaluated, in light of EU law, whether the language requirements as proposed by the WIB constitutes a restriction to the free movement rights, and if yes, if that restriction can be justified.

The case law of the CJEU shows that language requirements may constitute a restriction on free movement. In these cases, the Court has assessed whether language requirements, as a means of expressing national identity and supporting and promoting culture, constitute a legitimate interest to

¹⁰⁴ European Commission. *The European Universities alliances in action | European Education Area*. Retrieved December 11, 2023, from <https://education.ec.europa.eu/education-levels/higher-education/european-universities-initiative/about?>

¹⁰⁵ European Commission, 'What Is Erasmus+? | Erasmus+' <<https://erasmus-plus.ec.europa.eu/about-erasmus/what-is-erasmus>> accessed 11 December 2023.

¹⁰⁶ European Commission, 'The Bologna Process and the European Higher Education Area | European Education Area' <<https://education.ec.europa.eu/education-levels/higher-education/inclusive-and-connected-higher-education/bologna-process>> accessed 11 December 2023.

¹⁰⁷ S. Sivonen, 'A European degree: promoting transnational cooperation in higher education' <<https://crossborderitem.eu/en/item-briefs-11-a-european-degree-promoting-transnational-cooperation-in-higher-education/>> accessed 10 October 2024.

¹⁰⁸ Arts. 6 and 165 TFEU.

¹⁰⁹ Hoogenboom, A. (2016). *Balancing student mobility rights and national higher education autonomy*. [Doctoral Thesis, Maastricht University]. <https://doi.org/10.26481/dis.20161018ah>, p.150, p. 259.

¹¹⁰ Letta, A. (2024). Much more than a market.

justify such a restriction.¹¹¹ This has also been recently (2022) interpreted by the Court in *Cilevičs* specifically regarding language requirements for higher education.¹¹²

In *Cilevičs*, the Court discussed whether a national regulation in Latvia, which stipulates that higher education programmes can only be offered in the official language of the country, constitutes a restriction on the freedom of establishment under EU law. The Court found this to be the case, as the Latvian language requirement makes it less attractive for nationals of other Member States to settle in Latvia. The Court then considered whether this restriction could be justified by a legitimate public interest and whether it was suitable, proportionate, and necessary to the intended goal of protecting the official (Latvian) language as an expression of national identity. This was left to the national courts to determine. However, the Court noted that in order to avoid that the language requirements go beyond what is necessary, exceptions must allow the use of other languages (than Latvian) at least for courses offered in context of European and international cooperation, and education programmes on other languages and cultures.¹¹³

Against this background, the Dutch bill could also be considered a restriction of free movement rights and would also require a balancing exercise to be conducted in light of the principle of proportionality. Is the (relatively high) threshold of providing at least two-thirds of the study load in Dutch striking the right balance in achieving its objective on protecting the national education system, and expression of national identity in the Netherlands? Is this threshold and the potential implications in limiting influx of international students proportionate to this objective, especially in the context of the European Education Area, which, on the contrary, aims to foster cross-border mobility?

An article written by Schoenmakers assessed these questions. Namely, the author assessed whether the (indirect) restriction to free movement by the language requirements of the WIB can be justified by overriding reasons of general interests. Recalling one of the objectives of the bill, namely preserving and strengthening Dutch language (which was also used as a legitimate ground in the *Cilevičs* case), the author assessed whether this justification is appropriate and proportionate. Schoenmakers concluded that on the one hand, given that the bill provides several exceptions to the language requirements, a violation of the principle of proportionality may not be established, however, on the other hand, questions can be raised whether the promotion of the Dutch language cannot be achieved by less intrusive ways, such as attending language classes.¹¹⁴

When assessing proportionality of the WIB measures, it is clear that the language requirements in WIB may discourage non-Dutch speaking EU citizens to exercising their free movement rights to the Netherlands for study purposes. It was also acknowledged by the Ministry of OCW in its Explanatory Memorandum that language policies are applied to limit incoming student mobility. This can be supported by the data across the border as shown in section 4.2, especially the Flemish data. However, the extent to which mobility will be limited depends on how (strictly) the language measures are implemented. From a European and Euregional labour market perspective, offering part of the

¹¹¹ Schoenmaekers, S. L. T. (2024). De positie van de Nederlandse taal in het hoger onderwijs: reflectie vanuit het EU-recht. *Tijdschrift voor Onderwijsrecht en Onderwijsbeleid*, 2023-2024(3), pp. 141-154. See also C-379/87 Groener ECLI:EU:C:1989:599, C-250/06 United Pan-Europe Communications Belgium NV ECLI:EU:C:2007:783, C-202/11, Las ECLI:EU:C:2013:239.

¹¹² C-391/20 *Cilevičs* ECLI:EU:C:2022:638.

¹¹³ SLT Schoenmaekers, 'Het Arrest *Cilevičs*' (2022) 28 *Nederlands tijdschrift voor Europees Recht* 195.

¹¹⁴ *Ibid.*

education in Dutch — contrary to the argument that Dutch language requirements hinder (European) integration — can actually facilitate students' integration in the Dutch (and Euregional) society and is not necessarily a negative step.

In an Interreg-project promoting learning of neighbouring languages in the EMR, Hovens calls for a 'step-by-step' language integration. Instead of directly promoting the learning of neighbouring languages and discouraging the use of English, English could be leveraged as an initial language of contact or instruction. In the first phase of training, English can serve as the primary medium, with courses gradually transitioning to other languages over time.¹¹⁵ Education in Dutch could hence also positively impact the integration of students, especially if Dutch language would be gradually introduced during the education programmes. This is also true given indeed the access to the labour market especially of regulated professions (e.g., doctors, teachers, etc.) that may be conditional upon language proficiency. However, it is questionable whether in the current form of the proposed bill two-thirds of education offered in Dutch offer a realistic (and proportional) threshold for international (non-Dutch speaking) students to learn Dutch. The 2/3 rule could practically mean that only the first year is provided in English after which the rest of the programme is followed in Dutch. It is questionable whether the WIB, as currently designed, effectively promotes Dutch language learning for non-Dutch speakers (and subsequently their integration to the Dutch society) or merely grants access to education for those who already have a sufficient command of Dutch.

A more realistic step-by-step approach to language learning is already applied, for instance, at Maastricht University in the Medicine programme. Students begin their training in an English-track during the Bachelor's phase (three years) during which they receive Dutch language training. After Bachelor's, the aspiring doctors may continue to the Master's programme, which is offered exclusively in Dutch.¹¹⁶ This approach ensures that the programme is still initially accessible and attractive for non-Dutch speakers, and allows students to learn Dutch with the motivation to continue their studies to the Master's phase. However, in February 2025, it was communicated that the English-language track will be discontinued as a result of *numerus fixus* on the enrolment quota and its financial implications. Under these circumstances, the track could not continue, despite being the only English-taught program at UM that provided intensive Dutch language training to prepare students for a Dutch-taught master's, serving as a strong example of the language integration that some coalition parties have been advocating for. Similarly, the University of Groningen has decided to discontinue their English-language track of their Bachelor's programme in medicine.¹¹⁷

It is clear that the language requirements might decrease the attraction and accessibility of Dutch educational institutions and might instead encourage the pursuit of higher education or exchange programmes elsewhere (e.g., in the origin country or other (neighbouring) countries). This might especially be true in case active internationalisation strategies are pursued across the border, e.g. in the case of Germany. This is also the outcome of free movement rights in the EU according to

¹¹⁵ Hovens, D. (2023). *Verbinding door onderwijs in een grensregio: Waarom scholen in de Euregio Maas-Rijn wel/niet in buurtaalonderwijs en Euregionale schoolactiviteiten investeren*. Retrieved from <https://crossborderitem.eu/wp-content/uploads/2023/11/Onderzoeksrapport-EMRLingua-Daan-Hovens-NL-gecomprimeerd.pdf> accessed on 10 October 2024, p. 73.

¹¹⁶ See here: <https://curriculum.maastrichtuniversity.nl/education/bachelor/bachelor-medicine>

¹¹⁷ Observant, 'English-language Medicine track to be discontinued' 5 february 2025, accessed via: <https://www.observantonline.nl/english/Home/Articles/id/62910/english-language-medicine-track-to-be-discontinued>.

Hoogenboom; as long as maintained, there will be a “spill-over” effect of the policy of one state for other Member States. A concrete example of this is that when in the Netherlands a social study loan system was implemented, Dutch students have as a consequence opted to study in the Dutch-speaking region of Belgium.¹¹⁸ While these spill-over effects may be neutral from a euregional perspective for cross-border regions sharing the same language (as with Flanders and the Netherlands), it may be more restrictive on student mobility in cross-border regions where no common language is shared (Germany-Netherlands, Wallonia-Netherlands) and if education initially in a *lingua franca* (e.g., English) is not offered.

Next to preserving and promoting Dutch language, another objective of the WIB is to ensure financial stability of the education system in the Netherlands. This justification for restricting free movement rights —namely, the objective of maintaining the quality and financing of national education systems—has been raised in previous cases before the CJEU. In this regard, Member States must balance the objective of maintaining the quality or financing of national education system in the context of principle of proportionality and free movement (of students).¹¹⁹ However, this ground has been less successful in justifying the unequal treatment of students.¹²⁰ While the lawfulness of the WIB language requirements can be debated from the perspective of proportionality principle, the lawfulness in these other aspects is more borderline under EU law. For instance, in a recent letter, Minister Bruins requested an investigation into the grounds on which study financing could be restricted for EU students. In his advice, Prof. dr. Van der Mei notes that under EU law, it is not possible to tighten the requirements due to non-discrimination provisions.¹²¹

Finally, it is worth to note the European (Union) dimension and the facilitation of cross-border mobility and effective free movement rights within Europe do not necessarily imply that this is achieved solely through education offered in the English language. The Treaties of the European Union include specific provisions on the enhancing of cultural and linguistic diversity.¹²² For instance, the Erasmus+ programmes have a specific objective of promoting language learning and linguistic diversity.¹²³ However, it can be estimated that fewer students choose Netherlands as an (Erasmus+) exchange location, if the course offer is limited in Dutch – however, this again depends on how the 2/3 Dutch education is distributed in the study programmes.

A recent initiative by the European Commission regarding a joint European degree (label) serves as another example of EU initiatives promoting cultural and linguistic diversity. The plan for this initiative involves establishing a joint degree based on a set of common European criteria, one of which is multilingualism. Contrary to English being the primary language of instruction, the criteria promote learning in multiple (national) languages. Specifically, the criteria stipulate that students should be exposed to at least two official EU languages as part of their educational experience. It is important to also note that the Dutch bill provides an exception for joint programmes developed in collaboration

¹¹⁸ Hoogenboom, A. (2016). *Balancing student mobility rights and national higher education autonomy*. [Doctoral Thesis, Maastricht University]. <https://doi.org/10.26481/dis.20161018ah>, p. 295.

¹¹⁹ *Ibid*, pp.150-151, p. 259.

¹²⁰ See C-73/08 Bressol ECLI:EU:C:2010:181, C-393/10 O'Brien ECLI:EU:C:2012:110.

¹²¹ Kamerbrief over internationale studentenstromen, 15 October 2024.

¹²² Art. 3(3) TEU, Art. 165 TFEU.

¹²³ Find more at <https://erasmus-plus.ec.europa.eu/programme-guide/part-a/important-characteristics-of-the-erasmus-programme>.

with foreign institutions, i.e., there are no expected negative cross-border impacts on the Dutch policy on European joint programmes/degrees. Another exception is provided for education programmes of other languages and culture. In this sense, it could be argued that the language requirements of the Dutch bill are not contrary to the educational cooperation initiatives of the EU as they are exempt from this requirement. Yet, there is a clear difference in motives of the EU and Dutch agenda. While the EU moves towards facilitating mobility in the field of education, the Dutch political agenda has focused on restricting the influx of international students. Also, the instrumentalization of language is different in this respect, from an instrument promoting diversity to an instrument for limiting mobility.

6. Evaluation of the theme of socio-economic development

The European Union has fully committed itself to the United Nation's 2030 Sustainable Development Goals (SDG), including the provision of inclusive and equitable quality education and social inclusion, which is mirrored in the European Commission's work programme and agenda.¹²⁴ First, through the European Education Area, the Member States will be working together to "build a more resilient, and inclusive education system" through which a higher share of the young population between the ages of 25 to 34 will have completed a higher education qualification. Furthermore, through monitoring SDG 4 in an EU context, adult learning and digital skills will be promoted. In fact, through the European Education Area, the young generation will be able to benefit from the best education and employment across Europe.¹²⁵ Considering the SDG and the relevant policies of the EU in this regard such as the European Education Area, it is important to analyse the proposal on internationalisation against the EU perspective on the cooperation of the Member States and accessible higher education across the EU and in European (cross-)border regions specifically.

In this section, we establish whether the proposed measures will strengthen or weaken the position of higher education institutions in the EMR. In doing so, we analyse the relationship between universities (of applied sciences) in South-Limburg and the EMR. In addition, we compare whether accessibility of higher education and absorption capacity (e.g., in terms of housing) of (cross-)border regions differ with non-border regions. It can be expected that higher education institutions in border regions are affected differently than institutions in non-border regions. A vast literature has been written on the regional function of universities¹²⁶, but drawing a circle around the institutes gives a different view of the ones located in a border region and the ones that are not.

¹²⁴ Statistical Office of the European Communities, *Sustainable Development in the European Union Monitoring Report on Progress towards the SDGs in an EU Context 2023 Edition* (2023).

¹²⁵ *ibid.*

¹²⁶ See for example, Jones GA, McCarney PL and Skolnik ML, *Creating Knowledge, Strengthening Nations : The Changing Role of Higher Education* (University of Toronto Press 2005); Harrison J and Turok I, 'Universities, Knowledge and Regional Development' (2017) 51 *Regional Studies* 977.

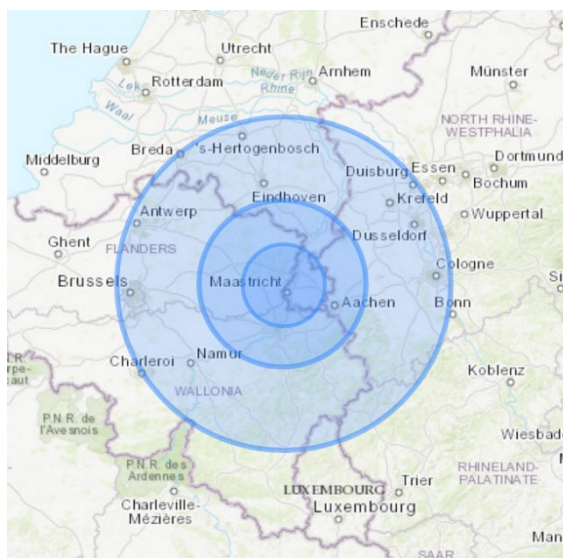


Figure 6: Circle of 25 km, 50 km and 100 km around Maastricht



Figure 7: Circle of 25 km, 50 km and 100 km around Utrecht

Source: mapsdirections.info

Figures 6 and 7 above display this in a simplified manner. For instance, for Utrecht University the regional scope is almost exclusively within the Netherlands, while for Maastricht University, for example, this is geographically for the main part across the borders: Belgium (Flanders and Wallonia), Germany (North Rhine-Westphalia), and within the 100 km radius even Luxembourg.

General sustainable/socio-economic benefits of the internationalisation of higher education

In order to assess the potential impact of the proposed measures on sustainable and socio-economic development of the border region South-Limburg and the Euregio Meuse-Rhine, we first need to discuss the benefits of the internationalisation of higher education (for the Netherlands) more generally.¹²⁷

The Netherlands

The Netherlands as host country of international students can benefit from the internationalisation of higher education in the short- and long-term. In the short-term, international students bring additional revenue through their general living expenses and – in the case of third-country nationals – through paying higher tuition fees. The exact revenue for the Dutch government depends on students' retention rate and labour market participation but has been estimated to be overall positive. On average, a student from an EER country brings between 5.0 to 16.9 thousand Euros net, and a student from a third-country brings between 68.5 and 96.3 thousand Euros net. This large difference depending on the students' origin is especially attributed to the higher stay rates of TCNs.¹²⁸ In total, the inflow of international students in the academic year 2021-2022, has been estimated to have a

¹²⁷ Reinold, J. (2018). *Migration and education: international student mobility*. Nederlandse Vereniging voor de Verenigde Naties. <http://nvvn.nl/migration-and-education-international-student-mobility/>

¹²⁸ CPB (2019). Economische effecten van internationalisering in het hoger onderwijs en mbo. Retrieved November 2024 from https://www.cpb.nl/sites/default/files/omnidownload/cpb-notitie-de-economische-effecten-van-internationalisering-in-het-hoger-onderwijs-en-mbo_0.pdf

positive net effect for the Dutch treasury of approximately 1.5 billion Euros.¹²⁹ If fewer international students are attracted to the Netherlands as a consequence of fewer English-taught programmes as suggested by Skali and Garretsen¹³⁰, this leads to a significant reduction in profits of the Dutch government in the short-term.

Based on international literature, the authors conclude that international highly educated migrants are positive for the economy. The authors find similar results for Flanders and Germany for example. A recent German study on the economic effects of internationalisation of higher education confirms the positive effects. A thousand international graduates in Germany would lead to an economic gain of between 93.3 and 329.8 million euros for the German government.¹³¹ Also, on the Flemish side of the border, research has been done into the economic costs and benefits of internationalisation.¹³² Both the absolute amount as the relative share of international students in Bachelor's-, Master's- and PhD programmes are increasing over time. In general, the net benefits are 2.6 to 3.3 times higher than the costs, although there are important differences among educational levels, nationalities, and disciplines. There may be a negative balance during the study, but compensated by a direct positive result after completion of the study. In their analysis, they argue that the balance of stay rates, costs, and benefits are relatively most beneficial in the case of international bachelor students, followed by master students and finally PhD students. Furthermore, the most positive benefit-cost results were found for students from the neighbouring countries (i.e. Germany, France, and the Netherlands). Based on their findings, the authors advise to relax the language requirements in the educational offer, allowing more foreign-language taught programmes. Nevertheless, stay rates should be closely monitored, as it is an important factor to the benefit-cost ratio.

¹²⁹ Elfferich, A. (2022). Stayrate en arbeidsmarktpositie van internationale afgestudeerden in Nederland. Retrieved November 2024 from <https://www.nuffic.nl/sites/default/files/2022-05/Stayrate%20en%20arbeidsmarktpositie%20van%20internationale%20afgestudeerden%20in%20Nederland.pdf>

¹³⁰ Garretsen, H. and Skali, A. (2024) The Cost of Nativism: Evidence from the Netherlands. <http://dx.doi.org/10.2139/ssrn.4910950>

¹³¹ Institut der deutschen Wirtschaft. (2025). Volkswirtschaftliche Effekte der Zuwanderung über die Hochschulen: Auswirkungen auf öffentliche Haushalte und Wertschöpfung in Deutschland. Keulen: Institut der deutschen Wirtschaft.

¹³² De Witte, K., Soncin, M., Vansteenkiste, S. & Sels, L. (2020). De economische effecten van internationalisering in het hoger onderwijs. KU Leuven. https://www.internationalisering.vluhr.be/files/rapport_de-economische-effecten.pdf

Table 12: Analysis of heterogeneity in retention rates and benefit-cost ratios by international students' nationality and level of education attained; Retrieved from De Witte et al. (2020; p. 55).

	Proportion of the international students population	Retention rate	Benefit-cost ratio
Panel A. By nationality			
Neighbouring countries	36.1%	64.9%	5.1-5.6
Other EU countries	10.5%	60.4%	4.8-5.2
Other Europe extra EU	1.6%	51.7%	4.2-4.5
Rest of the world	51.8%	38.4%	3.2-3.5
Panel B. By level of education			
Bachelor degree	34.8%	63.0%	4.7-6.1
Master degree	33.6%	45.4%	4.1-5.2
Doctoral degree	31.5%	56.6%	1.4-1.8
Panel C. By field of study			
Humanities	62.50%	55.9%	2.7-3.4
STEM	24.50%	48.1%	2.5-3.1
Biomedical	12.50%	60.1%	3.0-3.9

Source: Authors' elaboration on OECD (2013a; 2013b; 2017; 2018a; 2018b; 2019b); Flemish Government Social Security Data; HBS survey; Toerisme Vlaanderen (2017; 2018).

Note: The proportion of international students population presents the breakdown of students across categories. The retention rate reports the proportion of students who stayed in Belgium at least one quarter after graduation. The benefit-cost ratio is computed considering all the components of benefits and costs. The two values of the benefit-cost ratio reported by nationality refer to the upper and lower bounds of estimation (the first in the case that the entire population gained a professional bachelor degree, the second in the case of academic master degree). The benefit-cost ratio reports an upper and a lower bound, depending on the fact that the computation is made net or gross the students drop-out rate.

An important factor to the economic benefits is the stay rate. The more and the longer international students can be retained, the higher the benefits will be. The most positive effects are to be found at the Bachelor-level: The duration of the programme is longer, the chances of continuing on to further studies in the Netherlands are increased, and the overall likelihood of remaining in the country after graduation is higher. In the long-term, international students who are retained in the Netherlands after graduation contribute to expanding the domestic pool of highly skilled workers, which can contribute to mitigating current demographic challenges. International students are ideal candidates to retain since they have likely familiarised themselves with the Dutch economic, cultural, political and social context. In this regard, becoming more proficient in Dutch before or while studying as stipulated by the WIB could be of added value. Research on German regions has established that those that are hosting larger numbers of international students also attract more high-skilled (international) workers.¹³³ The human capital of (international) students and other highly skilled migrants can contribute to the Netherlands' economic growth, productivity, innovation and worldwide

¹³³ Burkert, C., Niebuhr, A., & Wapler, R. (2008). Regional Disparities in Employment of High-Skilled Foreigners – Determinants and Options for Labour Migration Policy in Germany. *Journal of International Migration and Integration*, 9(4), 383–400. <https://doi.org/10.1007/s12134-008-0071-y>

competitiveness. If more international students can be retained through improved Dutch skills, this could be beneficial to the sustainable and socio-economic development of the country, including its border regions. Whether this will actually be the case, is however, questionable.

Some literature hints towards negative economic effects of language policies for both international and national students. According to the Discrete Choice Experiment of Garretsen and Skali (2024), both Dutch and international students feel less attracted to the Dutch higher education offer. This results in fewer international students, that will come to the Netherlands. Only 21% of incoming students would still come to the Netherlands if the Bachelor's programmes were entirely in Dutch. When Belgian nationals are filtered out, only 13% remain. Furthermore, there appears to be no evidence that internationalisation has a 'crowding out' effect on Dutch students, i.e. the effect that education becomes less accessible and attractive to Dutch students. Research suggests the opposite ('crowding in'), whereby Dutch students are actually attracted to internationalisation. A recent report by the Dutch Education Inspectorate confirms this once again.¹³⁴

For Dutch border regions, it is also important to consider what is happening across the border. Universities across the border in Belgium and Germany are focusing on internationalisation, with English-language courses being increasingly integrated into bachelor's programmes. This may compete with Dutch (border) universities, with both incoming and Dutch students choosing to study across the border rather than in the Netherlands ('spill-over effect' / border effect).

In several surveys, international students and staff at Dutch higher education institutions^{135 136} as well as other highly skilled migrants in the Netherlands¹³⁷ have reported to increasingly feel less welcome and more concerned about political debates about curbing migration and controlling the internationalisation of higher education. This can have negative effects on their retention.¹³⁸ These developments are in contrast to initiatives in the EMR that aim at increasing the welcoming culture, for example through the former Interreg project youRegion¹³⁹, and the current "Welcome to Maastricht Region" programme from three municipalities Heerlen, Maastricht and Sittard-Geleen.¹⁴⁰ International students in the Netherlands can also contribute to sustained international student mobility to the Netherlands by becoming ambassadors for the country abroad provided that they are satisfied with their education and other experiences there. Increased feelings of insecurity and being unwelcome due to the political developments can already hamper this, which will likely lead to a downwards spiral if the proposed measures are introduced and the expected drop in international

¹³⁴ *Inspectie van Onderwijs*: Engelstalige universitaire bacheloropleidingen. Een casestudy naar redenen voor Engelstalig onderwijs. <https://www.onderwijsinspectie.nl/documenten/rapporten/2025/02/21/rapport-engelstalige-universitaire-bacheloropleidingen>

¹³⁵ Van der Wal, R. & Agterberg, R. (2023). Internationals feeling less welcome due to political climate. Retrieved November 2024 from <https://dub.uu.nl/en/depth/internationals-feeling-less-welcome-due-political-climate>

¹³⁶ Miserus, M & Lionetti, F. (2024). Studenten uit het buitenland voelen zich minder vaak welkom. Volkskrant. Retrieved November 2024 from <https://www.volkskrant.nl/kijkverder/v/2024/veel-internationale-studenten-denken-dat-nederlanders-niet-van-ons-houden~v1034472/>

¹³⁷ Shah, R. & van Uffelen, X. (2023). The highly skilled migrant feels less welcome and fears tightening of rules. Volkskrant. Retrieved November 2024 from <https://www.volkskrant.nl/kijkverder/v/2023/the-highly-skilled-migrant-feels-less-welcome-and-fears-tightening-of-rules~v892382/?referrer=https%3A%2F%2Fwww.ecosia.org%2F>

¹³⁸ Reinold, J., Siegel, M. First Impressions Matter: Feeling Welcome and Onward Migration Intentions of Highly Skilled Migrants. *Int. Migration & Integration* (2024). <https://doi-org.eur.idm.oclc.org/10.1007/s12134-024-01191-4>

¹³⁹ See <https://youregion.eu/>

¹⁴⁰ See <https://welcometomaastrichtregion.com/>

students is manifested. In addition, international researchers and teachers are expected to be deterred by the measures, especially the most productive ones who have better opportunities elsewhere.¹⁴¹ It remains to be seen which possible factor weighs more heavily: increased retention rates as a result of improved Dutch language skills or potential decreased retention rates due to increased feelings of being unwelcome and associated uncertainties for migrants in the Netherlands.

Furthermore, international students and graduates can contribute to strengthened collaboration between institutions and companies in the Netherlands and their countries of origin and/ or next destination. The future of such collaborations also depends on the extent to which the Netherlands remain attractive for international students if the proposed measures are introduced.

Implications for South-Limburg and the Euregio Meuse-Rhine

The associated benefits of the internationalisation of higher education at the national level also hold for the sub-national and (eu)regional level. Higher education institutions in border regions host comparatively larger numbers of German students.¹⁴² It is to be expected that a significant share of them stay away when there are fewer opportunities to study in English, which can have detrimental consequences for the higher education landscape and knowledge economy in the region. It is even feared that the presence of higher education institutions in the region is at risk.¹⁴³ This would also have negative consequences for the accessibility of higher education of Dutch students from the region, who tend to study in the same region where they grew up and have important consequences for (in)equality in the Netherlands, especially comparing border and non-border regions. At Maastricht University, for example, in 2024 around 73 per cent of Dutch Bachelor's students came from less than 100 km away. The university is less attractive for students who come from further away. This is relatively constant over time. Enrolment data shows that the amount of Dutch Bachelor's students from more than 100 km away is not really increasing or deviating over time.

If the educational offer in the region is reduced because of study programmes or institutions being closed, this could have as a consequence that youth from Limburg either has to move to other parts of the country or abroad, or that they choose against pursuing a higher education degree. Less opportunities to obtain a Bachelor's degree in English language, furthermore, complicates the transition of Dutch students from universities of applied science to enrol in an English taught Master's degree in the Netherlands or across the border, which requires prior education in English. At the same time, we know that students often continue education at their university or at another university in the Netherlands (e.g., following a Master's programme after the Bachelor's). In 2023, almost 40 per cent of first-year Master's students studied at a Dutch higher education institution before.¹⁴⁴ At Maastricht University, this share was even higher with around 47 per cent.¹⁴⁵ If they do not come for

¹⁴¹ Van der Wal, R. (2024). Onderzoek: Switch naar Nederlands kost universiteiten veel geld en veel publicaties. Ukrant. Retrieved November 2024 from <https://ukrant.nl/onderzoek-switch-naar-nederlands-kost-universiteiten-veel-geld-en-veel-publicaties/>

¹⁴² CPB (2019). Economische effecten van internationalisering in het hoger onderwijs en mbo. Retrieved November 2024 from https://www.cpb.nl/sites/default/files/omnidownload/cpb-notitie-de-economische-effecten-van-internationalisering-in-het-hoger-onderwijs-en-mbo_0.pdf

¹⁴³ This is one concern raised by Fontys during the internet consultation for the TAO.

¹⁴⁴ Universiteiten van Nederland (n.d.). Internationale studenten. Retrieved November 2024 from <https://www.universiteitenvannederland.nl/onderwerpen/onderwijs/internationale-studenten>

¹⁴⁵ Ibid.

the Bachelor's in the first place, this will also affect enrolment rates at the Master's level.¹⁴⁶ The situation is further exacerbated because as shown in Figure 3, universities located closer to the border offer a larger share of English taught programmes and employ more international personnel.¹⁴⁷ This is not only true for Maastricht University, but also for the RUG, TU Eindhoven, and University Twente. Radboud University is an interesting outlier here, due to regional profiling up to now.¹⁴⁸ If the WIB, including a TAO for existing courses, is introduced it can thus be expected that Dutch universities closer to the border will experience more challenges during the transition to more Dutch educational offers. It is unclear, for example, whether there are enough Dutch-speaking teachers in these regions, whether teachers from more central parts of the Netherlands would be willing to move to these alleged less attractive regions,¹⁴⁹ and whether international staff would be willing and able to learn Dutch well enough for teaching purposes. In times of cross-sectoral teacher shortages, recruiting Dutch-speaking teachers on such a large scale as required if the WIB is introduced is seen as impossible,¹⁵⁰ even more so in border regions.

At the same time, Limburg is facing a population decline because many inhabitants are attracted towards the Randstad. This decline is partly compensated by international students and workers. Figures also show that internationalisation of the population is mainly in the Randstad and border regions. Where the Randstad has the greatest share of persons with a non-EU background, border regions is characterised by a relatively great share of persons with an EU background.¹⁵¹ Belgian and German nationals living in the Netherlands are relatively concentrated in border regions, and cross-border workers can represent up to 2-5% of regional labour markets of Dutch border regions.¹⁵²

To a certain extent one could even speak of a certain dependency of the region on international talent. If international students, graduates, and knowledge workers stay away as a consequence of the WIB, existing problems would be exacerbated implying severe economic losses. Companies in the region, for example, already report serious challenges with finding the right candidates to fill vacancies because of skills shortages in the region and limited attractiveness of the region for workers from other Dutch regions.¹⁵³ In fact, with policies as the Expat Centre and the Talent Coalition in the Maastricht Region, active policies are employed to attract international workers. The introduction of the WIB will likely increase the challenges as it will also make attracting international workers more difficult. This again, will harm companies' innovation potential, productivity, economic growth and competitiveness. While the total pool of (international) workers is expected to decrease, the new language requirements

¹⁴⁶ Hooijen, I., Meng, C., Reinold, J. & Siegel, M. (2017) Competition for talent: retaining graduates in the Euregio Meuse-Rhine, *European Planning Studies*, 25:12, 2212-2231, DOI: 10.1080/09654313.2017.1354976

¹⁴⁷ Universiteiten van Nederland (n.d.). *Herkomst Personeel*. Retrieved November 2024 from <https://www.universiteitenvannederland.nl/onderwerpen/personeel/herkomst-personeel>

¹⁴⁸ In a discussion, it was raised that the discussion on euregional profiling is relevant for Radboud University in light of the internationalisation debate.

¹⁴⁹ Reinold, J. (2023). *Essays on attracting and retaining highly educated migrants*. [Doctoral Thesis, Maastricht University]. Maastricht University. <https://doi.org/10.26481/dis.20231005jr>

¹⁵⁰ Universiteiten van Nederland (n.d.). *Internationalisering blijft essentieel voor kwaliteit onderwijs*. Retrieved November 2024 from <https://www.universiteitenvannederland.nl/onderwerpen/onderwijs/internationalisering-blijft-essentieel-voor-kwaliteit-onderwijs>

¹⁵¹ CBS (2023). *Mensen met herkomst buiten Nederland wonen vooral in Randstad en grensregio*. <https://www.cbs.nl/nl-nl/nieuws/2023/49/mensen-met-herkomst-buiten-nederland-wonen-vooral-in-randstad-en-grensregio>

¹⁵² CBS, *Grensdata*. <https://grensdata.eu/#/InterReg/nl/>

¹⁵³ Reinold, J. (2023). *Essays on attracting and retaining highly educated migrants*. [Doctoral Thesis, Maastricht University]. Maastricht University. <https://doi.org/10.26481/dis.20231005jr>

will likely make it easier to find candidates who speak sufficient Dutch, which is sometimes reported as a challenge by Dutch firms.¹⁵⁴ Reacting to the WIB and budget cuts in higher education, major companies in the Netherlands voiced their concerns.¹⁵⁵ Some even contemplate leaving the Netherlands.¹⁵⁶ Given the dependency of Limburg on regional and international talent, the effects of the WIB can be expected to hurt the region more economically than central regions of the country, which are overall perceived as more attractive to a broader group of people. In terms of innovation potential, it can also be assumed that this will be affected if formal meetings at Dutch higher education institutions have to be in Dutch in the future, which can hamper the exchange of ideas.

Economic disparities between Dutch regions have grown in recent decades, highlighting the critical role universities play in their local economies. In regions like Groningen, Twente, and South Limburg, universities are among the largest employers, providing essential jobs and supporting the regional workforce.¹⁵⁷ This is underlined by a recent assessment of the economic footprint of Maastricht University on Maastricht, Limburg, and the EMR. If all bachelor's programmes were to be offered in Dutch language, the student population of Maastricht University is expected to decrease from 22,900 in 2022 to 13,500 leading to a decline of the University's added value for the regional and euregional economy, paired with the disappearance of around 2500 jobs in the (eu)region.¹⁵⁸ While the study only provides estimations for an 'all-or-nothing' scenario, where all programmes will be taught in Dutch – and the reality will be more nuanced with exemptions allowing foreign-language programmes – the tendency is clear.

It is also expected that the majority of German students chooses for a study programme elsewhere if available, for example at universities in the Ruhr area or Cologne, which offer similar programmes as Maastricht University. This can also impact cooperation between Germany and the Netherlands, especially in cross-border regions. In the case of Maastricht University, for example, 40.5 per cent of German Bachelor's students came to Maastricht from less than 100 km away in 2022. Statistics from RUG suggest that most German students enrolled there come from more than 200 km away. This challenges the definition of a border region, which may not capture the reality of higher education institutions if chosen too narrow. It also means that the situation of universities in different border regions varies significantly and that there cannot be a one-size-fits all approach for the internationalisation of higher education. Rather one should examine on a case-by-case basis what the situation of the respective border region and higher education institution is, including for example, the composition of the student population, economic importance for the region, absorption capacity of the region, population development in the region, skills shortages, etc. This is in line with the approach of the Regio Deals, which emphasise that "every region matters" (*Elke regio telt*).¹⁵⁹ A good example here is the housing of international students. While it is often a challenge, especially in the Randstad,

¹⁵⁴ Ibid.

¹⁵⁵ Universiteiten van Nederland (2024). Bedrijven in Nederland uiten zorgen over bezuinigingen op onderwijs, onderzoek en innovatie. Retrieved November 2024 from <https://www.universiteitenvannederland.nl/actueel/nieuws/bedrijven-in-nederland-uiten-zorgen-over-bezuinigingen-op-onderwijs-onderzoek-en-innovatie>

¹⁵⁶ Lahiri, I. (2024). Dutch government tries to stop ASML from moving out. Euronews. Retrieved November 2024 from <https://www.euronews.com/business/2024/03/07/dutch-government-tries-to-stop-asml-from-moving-out>

¹⁵⁷ Universiteiten van Nederland. Internationale studenten. Retrieved November 2024 from <https://www.universiteitenvannederland.nl/onderwerpen/onderwijs/internationale-studenten>

¹⁵⁸ Panteia (2023). Economische footprint van Universiteit Maastricht. Retrieved November 2024 from <https://www.maastrichtuniversity.nl/file/eindrapport-panteia-economische-footprint-umpdf>

¹⁵⁹ Rli, RVS & ROB (2023). *Elke regio telt! Een nieuwe aanpak van verschillen tussen regio's*. Den Haag.

there is reason to believe that border regions struggle less with their absorption capacity. In Limburg, there are even several examples of initiatives to provide housing for students from other study areas within the Netherlands or from across the border in Aachen (e.g., Pit Ground¹⁶⁰ in Sittard, *Katzensprung*¹⁶¹ in Vaals, and the Pilot project for housing for non-EU students studying in Aachen in Parkstad Limburg¹⁶²). The housing situation thus appears to be different in the border region of Limburg compared to more central regions of the Netherlands. This suggests that the proposed WIB needs a more nuanced regional perspective. Here, the TAO and its application when it comes to the interpretation and/or strictness of certain (regional) requirements has an important role.

International education offers significant benefits for international and domestic students' personal and professional development by enhancing their human, social, and cultural capital. It fosters intercultural competences and understanding, improves language skills and learning outcomes, and helps students develop a more cosmopolitan outlook and global networks, which can be an advantage for their future careers and lives. These skills can be an asset in cross-border regions and to increase cross-border cooperation and cohesion (see next section). Investing less in them can lead to more inward-looking generations with less interest and capacities to move the integration of cross-border regions forward. This can have negative implications for socio-economic development in (cross-)border regions. In this sense, the WIB will also affect border and non-border regions differently, as the development of non-border region is less dependent on these skills.

7. Evaluation of the theme of Euregional Cohesion

Finally, this dossier addresses key questions related to the third theme “Euregional cohesion” including 1) whether the proposed measures will affect student mobility within the EMR, and 2) whether the proposed measures will affect cooperation between higher education institutions in the EMR? The Explanatory Memorandum to the WIB states that “providing education in Dutch involves the risk that economic development and cohesion in border regions is silenced” (Section 6.1.1).

Higher education institutions play a critical role in fostering cohesion at various levels. Aspects of economic cohesion have already been discussed in the previous section. In addition, we have already established that there is a high risk that student mobility to the Netherlands will decrease. This is also true for student mobility between the sub-regions of the EMR, especially regarding inflow of German students to the Netherlands.^{163 164} It seems that investing in learning the Dutch language is only worth it if students cannot study their preferred subject (e.g., Psychology) elsewhere.¹⁶⁵ Previous research has established that increased trade and collaboration between international students' country of

¹⁶⁰ <https://www.maastrichtuniversity.nl/nl/nieuws/wonen-en-werken-bij-pitground-sittard>

¹⁶¹ <https://crossborderitem.eu/wp-content/uploads/2023/07/grefrap17-D4-NL.pdf>

¹⁶² <https://open.overheid.nl/documenten/ronl-8bf90101-4649-400c-89f4-29132d488990/pdf>

¹⁶³ Panteia (2023). Economische footprint van Universiteit Maastricht. Retrieved November 2024 from <https://www.maastrichtuniversity.nl/file/eindrapport-panteia-economische-footprint-umpdf>

¹⁶⁴ Garretsen, H. and Skali, A. (2024) The Cost of Nativism: Evidence from the Netherlands.

<http://dx.doi.org/10.2139/ssrn.4910950>

¹⁶⁵ Panteia (2023). Economische footprint van Universiteit Maastricht. Retrieved November 2024 from <https://www.maastrichtuniversity.nl/file/eindrapport-panteia-economische-footprint-umpdf>

origin and destination are among the benefits of international student mobility.¹⁶⁶ As student mobility from other parts of the EMR to Dutch Limburg is expected to decrease significantly if the proposed measures are introduced, this can also be expected to affect euregional cooperation and thus cohesion except between Dutch and Belgian Limburg.

On the other hand, if those students who still move within the EMR to study in Dutch Limburg become more proficient in Dutch; this can also have positive effects on euregional cooperation. At the same time, Dutch people are known for the good English skills and many are also proficient in German, so one does not really get the impression that euregional cooperation hinges on the improved Dutch skills of prospective German students and graduates from higher education institutions in Limburg. In addition, soft skills, which facilitate international or euregional cooperation, that are acquired in international classrooms (e.g., intercultural competences) will be reduced, which can also affect the quantity and quality of cross-border cooperation. This possibly suggests reduced cooperation on the one hand, but deepened cooperation on the other. It remains to be seen how the benefits of offering less foreign-taught programmes relate to the costs thereof in terms of euregional cohesion.

Reducing opportunities for foreign-language education in the region can also affect cooperation between universities, for example, when it comes to offering joint courses, programmes, or degrees. This is also one fear in Flanders, where the new government revealed plans to limit the internationalisation of higher education. Cooperation between universities in the EMR is already rather scarce and should rather be expanded instead of reduced for a more functional educational area. Examples for euregional cooperation in higher education include the AMIBM and the tuL. These will likely become under pressure if they cannot be offered in foreign languages any more if the WIB is introduced. A significant share of the programmes offered as part of these initiatives are taught in English, and it is questionable whether RWTH Aachen University will be interested in continuing cooperation through the AMIBM if Dutch language becomes the norm. Why would leading scientist involved in education and research at the institute be interested in learning Dutch, if they are not even living and/ or working in the Netherlands? It can thus be expected that cooperation becomes more difficult. To what extent for example joint courses, programmes, degrees, or cooperations are affected is also dependent of the formulation of exemptions and the implementation thereof. In this respect, under the current ministerial decree, a general exemption on the TAO is foreseen for joint programmes. Nevertheless, accreditation processes are still relevant for enabling new programmes. Furthermore, it is possible that competition between higher education institutions in the cross-border region will increase as universities in neighbouring regions may become more attractive for students now studying in Limburg. These tendencies seem to contradict the intentions employed in the EMR, for example recently by starting an Interreg project to set up trinational curricula in the field of circular science in the EMR.

In sum, the WIB will likely affect euregional cohesion. While it may bring advantages, it seems that the costs will exceed the benefits. How this will unfold in practice remains to be seen. Language is an important factor in cohesion. Some findings may suggest that English acts as a 'pull and push'-factor,

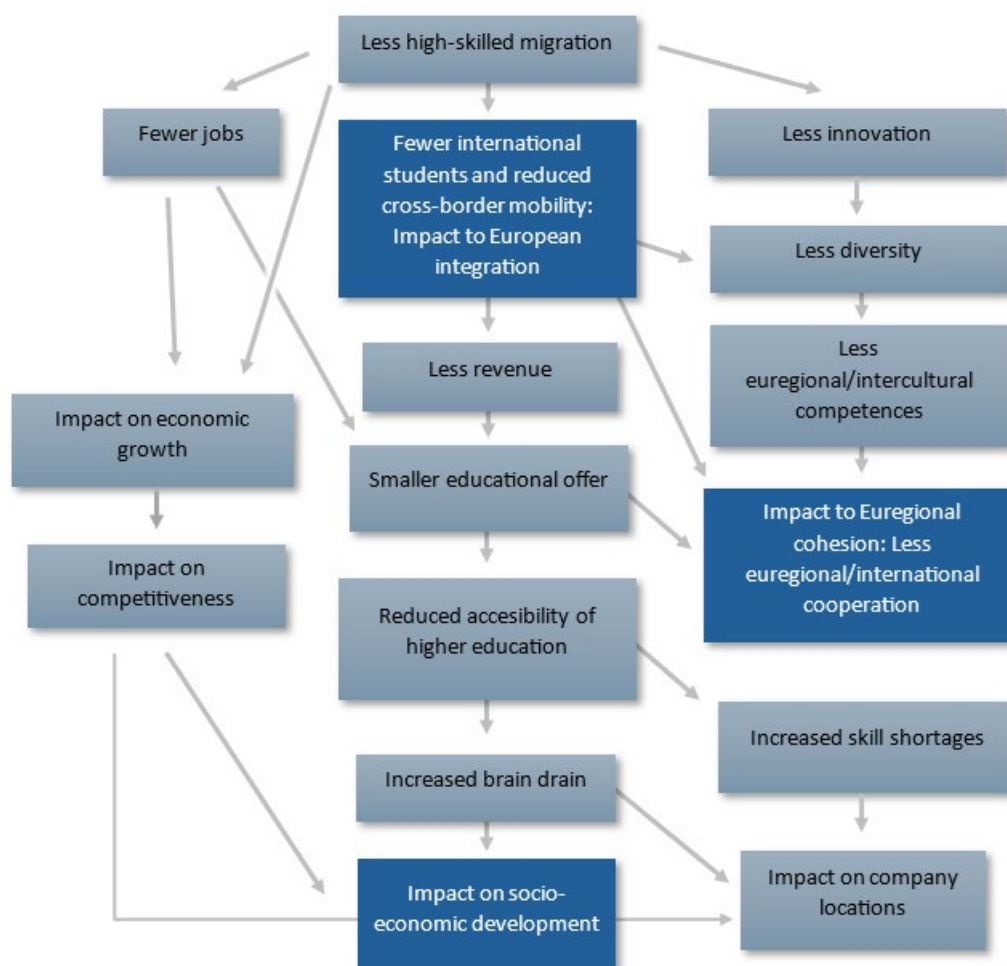
¹⁶⁶ Reinold, J. (2018). *Migration and education: international student mobility*. Nederlandse Vereniging voor de Verenigde Naties. <http://nvvn.nl/migration-and-education-international-student-mobility/>

both attracting (international) students and cooperation, but also as a possibly negative factor for stay rates in the long-term. On the other hand, euregional practices also show the embeddedness of the English language in euregional cooperation on a day-to-day basis.

8. Conclusions and recommendations from a Euregional perspective

This study set out to assess the potential cross-border effects of the proposed WIB and TAO on the Euregio Meuse-Rhine (EMR), with a particular focus on the language measures outlined in the proposed legislation. Using the ITEM Cross-Border Impact Assessment methodology and desk research, the analysis explored the implications of the proposed policies on three key themes: European integration, sustainable and socio-economic development, and euregional cohesion. The analysis assessed specifically how the language requirements of the WIB might influence cross-border regions: the mobility of international/euregional students, and whether these policies would enhance or weaken the position of higher education institutions in cross-border regions like the EMR compared to non-border regions. In addition, the study explored how the proposed measures might affect cooperation between higher education institutions within the EMR and their broader role in fostering cross-border cohesion.

Figure 8: Expected effects of WIB/TAO on the studied themes



Source: developed by the authors

The study highlights several key implications of the initiated WIB, particularly for border regions like Limburg. The introduction of language requirements and the reduction in international/euregional student enrolment could disproportionately affect border regions, limiting socio-economic development, innovation, and cross-border cooperation. **The majority of the research is conducted on the basis of the initial WIB proposal. The latest developments, including the possible exemption of the TAO for existing educational programmes, may limit the immediate impact in border regions.** As the amended bill will be published in fall 2025 and it will likely be subject of the elections, the research findings are still relevant for policymakers – both regarding existing and future educational programmes. In the following general conclusions on internationalisation and language policies for border regions will be shared, as well as euregional implications for the future development of the WIB proposal and self-regulatory measures of higher education institutions.

A decrease in student mobility within the EMR could undermine regional cohesion and hinder the development of intercultural competencies crucial for collaboration. Economic consequences could also be significant, with border regions facing decreased revenue, job losses, and a reduced ability to attract high-skilled migrants and businesses, exacerbating existing skills shortages. While the WIB aims to preserve national identity through language requirements, a more balanced approach could better promote integration and maintain the competitiveness of border regions. **Overall, the study underscores the importance of carefully designed policies that consider the specific needs of border regions to ensure continued cohesion and sustainable development.**

Regarding European Integration, there is a clear difference in the policy objectives on the EU-level and in the Netherlands. While the EU promotes transnational cooperation and cross-border mobility in the field of education, with recent initiatives such as the European Education Area, European Universities Alliances, and the European (joint) degree, the Dutch political agenda has focused on restricting internationalisation of education. The instrumentalisation of language is different in this respect, from an instrument promoting (linguistical) diversity (such as in Erasmus+ exchanges or transnational joint programmes) to an instrument for limiting mobility. This is not to the benefit of the euregional reality, where multilingualism is aimed at – both with the neighbouring languages as *lingua receptiva* as well as English as European *lingua franca*. The analysis highlights that while the objectives of the WIB on protecting national identity via language requirements might be justified under EU law, questions remain about its compatibility with the principle of proportionality. **Less restrictive measures, such as mandatory language classes, and/or a more gradual approach to integrating Dutch into education programmes, might achieve similar goals** while preserving the key rights of free movement in the EU, and accessibility of higher education. It is questionable whether the WIB, as currently designed, effectively promotes Dutch language learning for non-Dutch speakers (and subsequently their integration into the Dutch society) or merely grants access to education for those who already have a sufficient command of Dutch. The WIB risks reducing the appeal of the Netherlands as a study destination and might encourage (also Dutch) students to study elsewhere. **While partial Dutch instruction could support societal integration of students and labour market goals, not only in the Netherlands but in the Euregion, its impact depends on implementation.**

If higher education institutions located in South-Limburg have to limit programmes offered in foreign languages, this will likely have an impact on the border region (from a national/regional perspective) as well as the cross-border region (Euregio Meuse-Rhine). **Specifically, it is expected to affect international/ euregional student mobility from German- and French-speaking parts of the EMR to**

South-Limburg. These “spill over” effects are expected to be smaller between the Netherlands and Flanders (Belgium) due to their shared common language. Furthermore, when examining the language policies of regions and universities within the EMR, education is primarily offered in the official languages (Flemish, French, and German), with foreign-taught degree programmes being less common. However, Germany stands out in its commitment to internationalisation. If this leads to an increase in higher education programmes offered in English, it could attract students to Germany over the Netherlands. From a Euregional perspective, this may help alleviate the negative effects of students potentially leaving the Euregion due to the unavailability of English-taught undergraduate programmes. On the other hand, these spill-over effects could be mitigated by placing greater emphasis on learning neighbouring languages in primary and secondary educations, such as Dutch, within the Euregion — building on existing initiatives that already promote this approach.

The introduction of the WIB – depending on the exemption/application of the TAO – is expected to have varying effects on the sustainable and socio-economic development of border and non-border regions due to their distinct characteristics. Factors such as regional roles, appeal to domestic students and staff, dependency on international students and staff, proportion of foreign-taught programmes, and reliance on intercultural competencies are likely to result in a more challenging transition for Dutch border regions compared to non-border regions. A decline in international student enrolment, particularly at the Bachelor’s level, could reduce university revenues, economic contributions, and job opportunities, potentially leading to programme closures. This can affect accessibility also for Dutch students – especially given the fact that Dutch students may also favour internationally oriented education – and exacerbate brain drain. The reduced appeal of border-region universities may also deter high-skilled migrants. All of this combined could worsen skills shortages, hinder innovation, and drive businesses away from border regions. Moreover, reduced internationalisation could limit the development of intercultural competencies among future generations, which is essential for cross-border cooperation. At the same time, improved Dutch language skills might increase retention of those international students who still choose to come to the Netherlands.

Finally, this dossier examined the potential impact of the WIB on cooperation between higher education institutions in the EMR. Reduced student mobility, especially from Germany, could harm cross-border cooperation. While students coming to study in Limburg may improve their Dutch skills, the importance of Dutch proficiency for regional ties is uncertain, given widespread English and German skills. Limiting foreign-language education may strain university cooperation, as institutions like RWTH Aachen could withdraw from initiatives like AMIBM if Dutch becomes the primary language of instruction. This could lead to increased competition between higher education institutions in the Netherlands as well as within the EMR and diminish regional cohesion.

In addition, the definition of border regions applied in the WIB/TAO is arbitrary. The referred PBL publication is focussed on a theoretical model for assessing the job opportunities in a situation with and without an administrative border. This model is different to the regional functioning of higher education institutions. We therefore call for a more appropriate one that better reflects the realities of higher education in border regions and cooperation between higher education institutions across borders. Specifically, we emphasise the need to move away from a one-size-fits all approach for the internationalisation of higher education. To account for the realities of the respective (border) region and higher education institutions, one should examine on a case-by-case basis what the situation is on the ground and refrain from too generic measures. While both in a border region and with a

comparable educational offer as well as total student numbers, the euregional functioning of Radboud University and Maastricht University are very different. **Here, it is important to emphasise the difference of the euregional functioning of an institution in a cross-border region compared internationalisation strategies to attract other European and international students. We could define this as euregionalisation instead of internationalisation.** In this respect, the devil is in the details and the exact application of the TAO are decisive. While there are exemptions defined on paper, there will still be effects on cross-border regions when the criteria and exemptions are applied in the strictest and most limited sense.

Limitations

The main limitation of this study is that it is based on desk research. Future research should apply other methods to substantiate our arguments. For example, it would be interesting to conduct experiments among prospective students in cross-border regions to find out how changes in language requirements at Dutch higher education institutions influences their aspirations to study in the Netherlands. Would they rather invest in learning a new language or moving further away from their place of origin?

Finally, it should be emphasised that this dossier is a very dynamic one. As we finalise it, it remains unclear what form the WIB and TAO will take and what this means for border and non-border region in the Netherlands. Furthermore, universities have presented self-regulatory measures, of which the concrete impact is also unclear. This insecurity is exacerbated by imminent financial cutbacks in higher education, which are already showing the first effects with programmes being closed and declining enrolment rates. Currently, it is expected that the amended bill will be presented in fall 2025, where existing educational programmes may be exempted from the TAO. Also, the exact wording and implications of (border) regions will be subject to the legal amendments. Furthermore, the coalition has fallen, and the bill might be subject of the agenda of political parties during the elections (and the new government). It is therefore important to keep an eye on developments in higher education policy in the Netherlands as well as ongoing research about them. Different higher education institutions are working on additional assessments of the potential consequences of these developments, of which many have not been published yet at the time of writing this conclusion. They may give additional insights into the effect of the WIB and TAO on higher education institutions and differences between border and non-border regions.

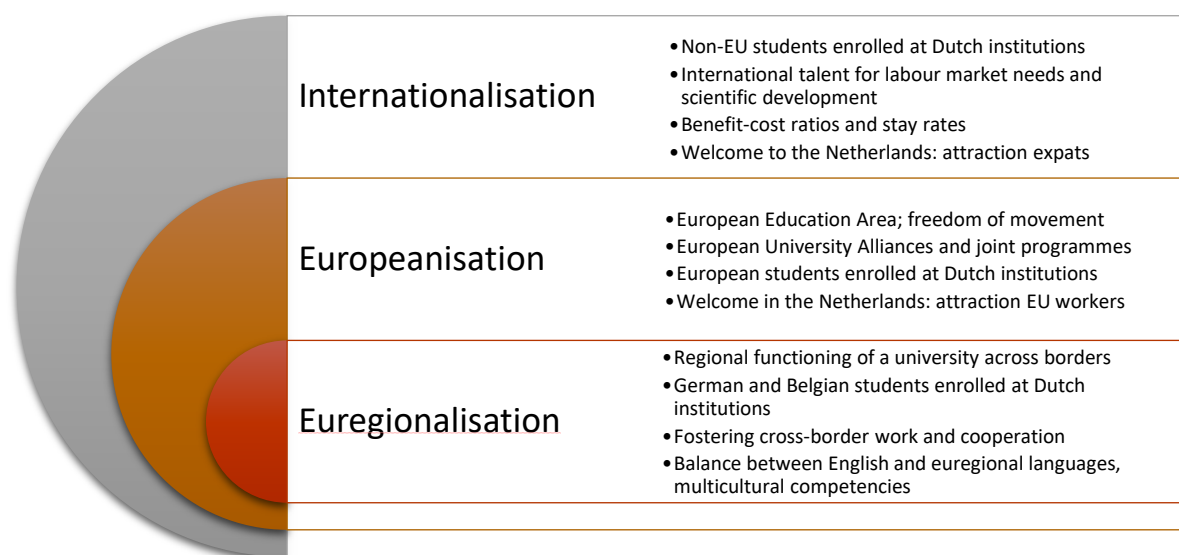
8.1. Euregional implications for policy and practice

Despite the uncertainties regarding the proceeding of the bill, the authors highlight some important euregional implications of the report for future developments, both at the level of policy and practice.

Nuance needed: Internationalisation, Europeanisation and Euregionalisation

The dossier revealed that the composition of “international” students can vary between border regions and non-border regions. In general, relatively more European students are enrolled at higher

education institutions in border regions compared to in non-border regions. Looking at the Dutch universities, both the amounts and shares of non-European students appear to be higher at universities in non-border regions. At UM, the argument of ‘euregionalisation’ can be supported as a significant share of ‘international’ students actually come from the cross-border region, rather than from more distant EU or non-EU countries. **This challenges the definition and distinction between students from the euregion and the "international students" that the WIB aims to target.** Similarly, as with the distinction between "Euregionalisation" and "internationalisation," it is important to acknowledge and address this difference in policy discussions, just as “Europeanisation”. In general, there tends to be more European students enrolled at higher education institutions in border regions. Enrolment data for bachelor programmes at Maastricht University show the relevance of this distinction. About 50% of the bachelor students come from within 100 km, students with origins from the Netherlands, Germany, and Belgium are good for about 70% of all bachelor students. Another 23% comes from other EU Member States and about 7% from non-EU countries. **It is therefore advisable to apply a distinction between Euregionalisation, Europeanisation and Internationalisation and monitor inflows of international/ euregional students more precisely and keep track of their exact origin to be able to measure the impact of the WIB.** While higher education institutions may already do so (e.g., Maastricht University), this data is not publicly available, which makes analyses like this one more complicated. The distinction is not only relevant for higher education institutions, but also for different policies and instruments for better coordination. Higher education and its internationalisation should not be seen in isolation but in its economic and societal framework, that requires coordination between several sectors, ministries, and departments. In this respect, we have mentioned some initiatives for European educational cooperation, euregional initiatives and developments and talent recruitment strategies on European (Welcome in the Netherlands) and international (Welcome to NL) level. There is thus a need for more nuance.



Universities and their euregional context

Universities located in border regions already put forward euregional initiatives and actions, next to those of Europeanisation (for instance the European Universities) and Internationalisation. Some good examples are presented in this report, that varies from language education, cooperation with

stakeholders in the Euregion, research in the Euregion and with euregional partners, and having a cross-border focus in education through e.g. the trinational curriculum in the EMR, the Netherlands-Germany-Studies as specific Master for European Studies at Radboud University and the international Bachelor Public Governance across Borders at University of Twente with the University of Münster. Nevertheless, comparing it to initiatives that can be categorised under Internationalisation and Europeanisation, more euregional ambitions could be formulated by universities in border regions. While universities do cooperate across borders in research and education, it is often case-by-case, project-based and not very institutionalised. Even in relatively successful cross-border regions, cross-border activities by universities remained marginal in general.¹⁶⁷ A prime example for Dutch universities could for example be the University of the Greater Region (Uni-GR), where universities in an Euregion cooperation cooperate at institutional, research and educational level. Comparing it to the institutional cooperation that does take place at European, transnational level under the European University Initiatives, more ambitious euregional initiatives may be employed.

While English as *lingua franca* is effective in attracting national, euregional, European and international students, having competencies in Dutch or other euregional languages is proven to be beneficial for the stay rates within the (eu)region. Therefore, it should be promoted that universities have defined more ambitious plans to promote Dutch language courses among students. However, for universities in multilingual contexts, such as the EMR, attention should be placed to neighbouring languages as well. Here, research also shows the effectiveness of 'learning by doing', that means learning a language as part of the educational programme. The 'pilot' at Maastricht University to include Dutch language training as part of the curriculum of the bachelor Psychology is a relevant one.¹⁶⁸ In this respect, inspiration may also be derived from ULiège for instance, that is currently integrating language modules in the bachelors of Law and Economics – tailored to the subject of study (e.g. legal translations). When developing or updating courses and curricula, universities in border regions should also consider to include more euregional aspects in their education. It would for instance be interesting to have euregional or cross-border focus within minors¹⁶⁹ or studies as European Studies, International Business and European Law, or even have a programme specialised at cross-border topics¹⁷⁰. Also, the connection with the euregional labour market and enterprises may be enhanced, in e.g. the formulation of curricula, development of courses and trainings and internships.¹⁷¹

Border regions requires a different view from shrinkage regions

It was already mentioned in the introduction: often the concepts of border regions and shrinkage regions are used interchangeably or in the same frames, by politicians, policymakers and the higher

¹⁶⁷ J. Van den Broek, P. Benneworth & R. Rutten (2019). Institutionalization of cross-border regional innovation systems: the role of university institutional entrepreneurs. *Regional Studies, Regional Science*, 6(1), 55-69.

¹⁶⁸ Observant, Pilot bij FPN: Nederlandse taalles als onderdeel van het curriculum, <https://www.observantonline.nl/Home/Artikelen/id/63468/pilot-bij-fpn-nederlandse-taalles-als-onderdeel-van-het-curriculum>

¹⁶⁹ For example, Zuyd Hogeschool offers euregional minors: <https://www.zuyd.nl/landingspaginas/minoren/breed-toegankelijke-minoren-euregio>

¹⁷⁰ Such as the Master in Border Studies at the Uni-GR, https://www.uni-gr.eu/en/Master_Border_Studies, or the Benelux programmes.

¹⁷¹ Nuffic, Internationale afgestudeerden op de werkvloer, <https://www.nuffic.nl/onderzoek-en-cijfers/onderzoeken/internationale-afgestudeerden-op-de-werkvloer>

education institutions themselves. This report highlights the importance of making an adequate distinction between shrinkage regions and border regions. There are several territorial distinctions, in which in many cases there can be a combination of territorial characteristics. This could also be the case for a region, located at the border and facing population decline. In fact, often this is the case for border regions in the Netherlands (but definitely not always). Nevertheless, the different territorial characteristics require a different policy approach. While shrinkage regions are often facing population decline, an ageing population and dejuvenation, border regions are characterised by cross-border mobility, interactions, and cooperation and affected by the proximity of neighbouring countries, policies, administrations, and cultures. From a policy point of view – as well as a functional one, this requires a different perspective when talking about the aim behind the bill and its possible outcomes. For shrinkage regions, arguments of housing may be less prominent and international talent is well-welcomed to combat the decline and ageing of the population. This may also be true for border regions, but not limited to. First, the systematic differences across borders and policies employed across the border may influence the Dutch border regions. The internationalisation activities across the border may impact the Dutch higher education institutions located at the border ('spill-over effect'). Second, the student market for higher education institutions in border regions is naturally across borders (360 degree perspective). Third, border regions are characterised by higher levels of influences across borders – also in terms of language and culture. While multilingualism is an asset to all higher education institutions, this is definitely true in a cross-border setting. Finally, the cooperation across borders (and thus mobility) is logical when higher education institutions across borders are the closest to each other, but solely separated by a land border. The same is true for the housing market.

This list is not exhaustive, but provides arguments for a more nuanced debate on the regional circumstances in which a higher education institution is located. In terms of population decline, some needs of a border region may be the same as of a shrinkage region, but the dynamics a policymaker (and practitioner) should consider are very different in nature.

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