

What's in a name: the concept of integration policy at European level

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Introduction

Ever since the European heads of state and government first called for 'a more vigorous integration policy' at the Tampere summit in 1999, a European framework for migrant integration has emerged (European Council, 1999). Considering that, until recently, national governments firmly held on to their exclusive competence in the sensitive field of integration policy, it is surprising that the member states *überhaupt* decided to place integration policy on the European agenda.¹ Even more conspicuous is that they invited the Commission to take action in the field of integration, even though there was then no specific legal basis for the development or coordination of integration policy at EU level. Only the recent Treaty of Lisbon (2009) first contained an explicit reference to integration measures. Article 63a (4) stipulates that "the European Parliament and the Council, acting in accordance with the ordinary legislative procedure, may establish measures to provide incentives and support for the action of Member States with a view to promoting the integration of third-country nationals residing." Direct harmonization of national

¹ For a detailed analysis of why member states first decided to place integration on the European agenda, see Goeman, H., '*Symbolic agenda-setting with unexpected consequences: the case of EU integration policy*'. Paper presented at the 5th General ECPR Conference, ECPR, 10-12 September 2009, Potsdam.

integration policy was nonetheless explicitly excluded; the concrete implementation of integration policy remains the sole competence of the member states.

However, this lack of legal authority did not prevent the European Commission from developing a European policy framework for migrant integration over the last decennium. Based on a broad interpretation of articles 63 (3) and (4) in the Treaty of Amsterdam (1997), the Commission immediately after Tampere launched a number of initiatives to substantiate the above call for a 'more vigorous integration policy'. What is understood by 'integration policy' at European level in fact consists of a curious mixture of so-called 'hard' and soft law (Trubek and Trubek, 2003). On the one hand, both directives on anti-discrimination 2000/43/EG; 2000/78/EG) as well as those on family reunification (2003/86/EG) and long term residence of third-country nationals are counted as hard integration measures. On the other, the European integration policy consists of a collection of soft policy instruments. First, the Council for Justice and Home Affairs, under supervision of the Dutch Presidency, established a list of eleven 'Common Basic Principles on Integration' (Council, 2004a), which serve as parameters for all EU initiatives in the area of integration policy. There is a 'European Handbook on Integration' with 'best practices' from the different member states and an 'Annual Rapport on Migration and Integration', which summarizes national trends. In addition, a network of national contact points for integration has been created to facilitate the exchange of information between national experts, as well as a website to guarantee the involvement of local actors. And finally, a European Integration Fund (EIF) was established to financially support the member states in their efforts to elaborate and rethink their national integration policies. In 2005, the Commission brought all these initiatives together in a 'Common Agenda for Integration; Framework for the integration of Third-country Nationals' (Commission, 2005), which should be regarded as the provisional cornerstone of the European integration policy. Based on the common basic principles, this document presented a number of practical guidelines to improve the consonance between national integration policies on the one hand, and national and European initiatives on the other.

Pointing out that "such a horizontal approach requires co-ordination", the Commission did not hesitate to attribute this role to the European institutions. It argued that "the EU could contribute by developing a pedagogical strategy, promoting the exchange of information and good practice, especially at local level and the development of guidelines or common standards for integration measures" and that "a community action programme to promote the integration of third country nationals could be developed aimed at improving the understanding of the issues concerned" (Commission, 2000: 19). Even though some member states have clearly put their stamp on the ongoing policy debate, the Commission indeed has been mainly responsible for shaping the European framework for integration policy. Particularly given the opposing integration paradigms – most notably the

multiculturalist model in Britain and the civic-republican approach in France (Favell, 2001) – that have long divided policy-makers across Europe, one cannot help wondering what ideas and concepts on integration inspired the Commission when proposing the above measures? What notion of integration policy is underlying the emerging framework at European level?

Integration indeed is a contested concept that has been translated into various policy models throughout the European Union (Koopmans and Statham, 2003; Adam, 2010) My article thus aims at tracing the integration paradigm that informed the European approach. Taking the existing literature on integration models as a starting point, it seeks to understand which – if any – model for integration policy has inspired the emerging policy framework at EU level. Despite the fact that many actors have tried to influence the European policy debate on integration, this article will mainly focus on the role of the Commission, the European Council and a select number of European Presidencies. The interplay between these three actors proved decisive for the eventual interpretation of integration policy at European level. Based on an in-depth analysis of their policy statements and a number of interviews, this article will try to explain the curious, even contradictory shape of the present integration framework at EU level.

A typology of integration models

Over the last two decades, several authors set out to develop a typology of integration models. Approaching the matter from different perspectives, these attempts have sparked a theoretical discussion, which continues until today. The debate was first initiated in the early nineties by Rogers Brubaker. In his famous article 'Immigration, citizenship, and the nation-state in France and Germany', Brubaker argued that different conceptions of nationhood could explain the varying citizenship practices in these two countries (Brubaker, 1994). More than solely a form of membership, he considered citizenship as a specific cultural imprint of nationhood, which symbolically demarcates the possibility for migrants to join the national community. As such, he argues that the civic and assimilationist conception of nationhood in France explains why this country adopted a *ius soli* regime for acquiring citizenship, whereas the ethno-cultural and differentialist self-understanding in Germany accounts for the fact that citizenship long remained a privilege for people with ethno-cultural bonds to the nation (*ius sanguinis*). Critics soon argued that his distinction between ethno-cultural and civic-cultural forms of citizenship largely overlooked the cultural rights dimension, which had been central to the ongoing debate on multiculturalism. Similarly inspired by the revival of citizenship as a central category for analysis, scholars like Modood and Martiniello likewise used the concept of citizenship as basis for their work on the position of

ethnic minorities and the impact of multiculturalism in Europe (Modood and Werbner, 1997; Martiniello, 1998).

A number of ethnic relations scholars have since attempted to reconcile the multiculturalist focus on cultural rights with the formal criteria for access to citizenship as used by Brubaker. Most renowned in that regard is the work of Stephen Castles, who developed a typology of three distinct citizenship models (Castles, 1995); a differentialist model, an assimilationist model and finally, a multicultural or 'pluralist' model. Each regime corresponds to a particular institutional and discursive context, which informs all discussion on migration and ethnic relations policies. The differentialist or 'exclusive' regime completely denies migrants and their descendants access to the political community or makes it extremely difficult for them to get naturalized. The German 'guest worker' model long served as prime example of this regime but since the introduction in 2000 of a new, less restrictive citizenship law in Germany, this model no longer seems to exist in Europe. The most relevant difference to discuss in this context hence lies between the assimilationist and the multiculturalist model; both models similarly provide for easy access to citizenship but significantly differ in the way they seek to realize social cohesion and equality; either by attempting to gradually erase cultural differences (assimilationism) or by recognizing and foster these differences (multiculturalism). In practice, the cultural recognition of groups amounts to the granting of group right and secondly, the adaption of general rules, which are said to bear the stamp of the dominant culture and should hence be adjusted (Castles, 1994)

Even though the above models strictly speaking represent different, ideal-typical citizenship regimes, they became more broadly understood as 'models of integration'. More recently, Koopmans and Statham have sought to further refine this categorisation of integration models (Koopmans and Statham, 2003). Arguing that a typology based on two dimensions of citizenship should logically yield four – instead of three – options, they designed a two-dimensional, conceptual framework that allows for a more precise and nuanced localisation of the different conceptions of citizenship. On the vertical axis, the continuum runs from conceptions of citizenship that favour ethno-cultural bonds as a condition for formal membership of the political community to those which rest on a civic-universalist interpretation of political culture and therefore attribute citizenship on the basis of the territorial principle. The horizontal dimension represents the cultural dimension of citizenship, ranging from cultural monism to cultural pluralism; the former expects all citizens to share a single cultural model whereas the latter allows and even encourages cultural heterogeneity amongst citizens. By combining both dimensions, the authors then identify four (integration) models; ethnic assimilationism, ethnic segregationism, civic republicanism and civic pluralism. Importantly, Koopmans and Statham emphasize that these four ideal-type conceptions do not empirically exist in

their purest form. The added value of creating a conceptual space exactly lies in the fact that it allows for a less static and one-dimensional interpretation of citizenship and integration models in which different actors and policies can be traced over time. Ilke Adam moreover claims that “the situation of policy frames or policy instruments within this two-dimensional space” makes it possible to show their varying degrees of coherence’ (Adam, 2010: 9). As such, the typology of Koopmans and Statham offers an interesting tool both to distinguish the different conceptions of integration as prevalent at European level and to check the consistency of the varying principles underlying the present EU policy for integration. Taking this model as a conceptual starting point, this article will thus proceed to discuss both the formal aspects and the cultural dimension of the European integration policy in view of situating the European conception of integration within the two-dimensional space of the above authors. In conclusion, the knowledge gained will then be used to compare the European conception of with changing ideas on integration at domestic level.

It may seem an odd decision to choose the typology of Koopmans and Statham as framework for analysing the European conception of integration policy. Even though their model is commonly used to classify integration policies, it is entirely build up around conceptions of citizenship. However, it hardly needs to be pointed out that the European Union as such does not have the authority to grant formal access to EU citizenship. European citizenship is nothing but a derivative of national citizenship; citizens of a member state automatically acquire citizenship of the Union. Additionally, the emerging EU policy for migrant integration is specifically targeted at third-country nationals, non-EU citizens who are legally resident in the territory. Interestingly, the integration of EU citizens is not considered problematic at European level. The conceptual link made by Koopmans and Statham between formal access to citizenship on the one hand, and the varying cultural obligations towards ethnic minorities as epitomized by and translated in integration models on the other, thus seems to be void in the European context. As such, the model at first sight appears useless for analysing integration policy at European level. Nevertheless, I argue that it is possible to use the two-dimensional space as described above; the EU may indeed be unable to attribute formal citizenship (both national and European), but instead developed an new model of citizenship to promote integration: *civic citizenship*. Given the reluctance of member states to easily naturalize third-country nationals – even though some countries have recently liberalized their citizenship laws, most notably in Germany – the European Commission looked for an alternative inclusion mechanism and found inspiration in practices of citizenship. The notion of civic citizenship is hence presented as a central element of the European integration policy. In the following paragraphs, I will both explain how the concept of civic citizenship was framed and where it fits in the conceptual space of Koopmans and Statham.

Civic citizenship as formal basis for integration

The Commission first introduced the concept of civic citizenship in 2000, as part of its 'Communication on Community Immigration Policy'. It defined the concept as "guaranteeing certain core rights and obligations to immigrants which they would acquire gradually over a period of [five] years, so that they are treated in the same way as nationals of their host state, even if they are not naturalised" (Commission, 2000: 19). At Tampere, the heads of state and government had indeed emphasized how "the challenge of the Amsterdam Treaty [would be] to ensure that freedom [...] can be enjoyed in conditions of security and justice accessible to all [...] This freedom should not, however, be regarded as the exclusive preserve of the Union's own citizens [...] It would be in contradiction with Europe's traditions to deny such freedom to those whose circumstances lead them justifiably to seek access to our territory" (European Council, 1999). As such, the fair treatment of third-country nationals became one of the four central guidelines of the Tampere Conclusions. The member state leaders however refrained from specifying their statements into actual policy proposals; the text merely stressed both the need for an approximation of rights between EU citizens and third-country nationals and an improvement of EU non-discrimination measures. The concrete interpretation of these ideas was left to the Commission.

The latter gladly accepted this assignment and has since then not missed an opportunity to expound on its own ideas on integration policy. In a written contribution on EU integration policy from 2005, Commissioner Vitorino nicely summarized the views of the Commission. He stated that "integration policy should be a crucial part of any immigration policy strategy. Since a proper assessment of immigration should not only focus on the cost to the host societies but also take into account the great advantages that come as a consequence of immigration, it would be unreasonable and even intolerable to deny certain rights to immigrant communities or to neglect to set up a proper frame of obligations similar to the one already existing for EU citizens." (Vitorino, 2005: viii) He moreover added that "this concept [of civic citizenship] should embrace a strong practical facet, since the European Union cannot claim to be a political bulwark of shared democratic values and non-discrimination if it leaves the status of thousands of residents in the European territory unregulated. The European Union is a community of citizens. Accordingly, the Charter of Fundamental rights has become a reference document for the extension of civic citizenship to third-country residents. Its importance is also underlined by the approval of a Directive on the status of third-country nationals' long-term residency status, with respect to employment, education, social protection, freedom of association and movement, and other areas. In this regard, it

is paramount to see the EU Constitution receives quick approval” (Vitorino, 2005: viii-ix).

It is interesting that the Commission chose to imply the notion of citizenship in this context; instead of merely granting rights to third country-nationals – as indeed happened with the approval of the Directive on Long-term Residence for third-country nationals – the Commission deliberately invented an innovative concept of citizenship in view of integration all legally resident third-country nationals within the territory of the EU as members of the European political community. As mentioned, the European Union is portrayed as a community of citizens. The Commission thus consciously framed its discourse on integration in terms of citizenship; the underlying assumption is that granting migrants the formal rights attached to civic citizenship would be a sufficient warranty for successful settlement into society. By that means, the Commission primarily reduced the notion of integration to its legal dimension. Taking a pragmatic approach, the extension of rights for third-country nationals became the central objective of its efforts to promote integration. The status of civic citizenship thus primarily became a vehicle for the attribution of rights.

This rights-based approach is reminiscent of the ideas of Thomas Marshall on citizenship. In his famous article ‘Citizenship and Social Class’, Marshall distinguishes three categories of rights that stem from citizenship (Marshall, 1950). First, civil rights which he describes as rights necessary for individual freedom: liberty of person, freedom of speech, thought and faith, the right to own property, the right to justice etc. Secondly, political rights or the right to participate in political power by taking part in elections either as voter or candidate. And finally, social rights, which include “the whole range from the right to the modicum of economic welfare and security to the right to share to the full in the social heritage and to live the life of a civilised being according to the standards prevailing in society” (Marshall: 149).

In this context, it should be noted that most of the above rights are included in the Charter for Fundamental Rights, which the Commission – as mentioned above – considers “the reference document for the extension of civic citizenship to third-country nationals” (Vitorino, 2005: viii). Indeed, the Charter for Fundamental Rights does not merely apply to citizens of the European Union but, “because of the universality of certain rights” (Commission, 2000: 11), to all persons in the Union, including third-country nationals. Following the ratification of the Lisbon Treaty in 2009, the Fundamental Rights’ Charter moreover has the same legal value as the European Union Treaties and as such has become a tangible source of legal protection for third-country nationals. Civil rights are guaranteed for everyone, respectively in the chapters on Dignity (art. 1-5), Freedoms (art. 6-19), Equality (art. 20-26) and Justice (art. 47-54) Chapter IV on Solidarity moreover protects social rights, such as the right to collective bargaining (art.28), the right to fair and just

working conditions (art.29), and the right to health care (art. 35) and social security (art. 34) (Charter of Fundamental Rights, 2000). Particularly the right to social security for third-country nationals, however, long proved a sensitive topic among member states. Whereas national governments soon agreed to provide access to their social security system for citizens of other member states, they were reluctant to do the same for non-EU citizens. With the introduction of article 13 on non-discrimination article in the Treaty of Amsterdam (1997), member state governments could however no longer link insurance and social security to the national citizenship of an EU country as that would imply a direct discrimination against third-country nationals. Hence, the extension of social security schemes to non-EU citizens has meanwhile been secured in the amended European regulation 859/2003 on the extension of regulation 1408/07 regarding the application of social security systems to third-country nationals. As a result, persons residing in the territory of a member state, either EU citizens or third-country nationals, are subject to the same obligations and enjoy the same benefits under the legislation of a member state as the nationals of that state (Council, 2003c). In short, civic citizenship thus guarantees both the civic and social rights that Marshall considers fundamental characteristics of citizenship. However, the main difference between civic citizenship and the ideal-type of 'Marshallian' citizenship concerns the attribution of political rights. Even though the common basic principles emphasize the importance of political participation of third-country nationals for their integration and indeed encourage member states to minimise obstacles to the use of voting rights, third-country nationals can still not participate in most national elections (Baubock, 2007).² The Charter for Fundamental Rights explicitly mentions the right to vote and stand as a candidate in both European and local elections but, in contrast to all other stipulations, reserves these rights for European citizens. Another source of inequality lies in area of mobility rights; third-country nationals do not enjoy the same freedom of movement as EU citizens in the sense that they cannot simply decide to live and work in another member state (Iglesia Sanchez, 2009).

According to 'Marshallian' standards, civic citizenship thus falls short of realizing citizenship as a status of full membership of a community. Instead, it perpetuates the prevalent inequalities between EU and non-EU citizens, creating an ever growing group of 'denizens' within the European Union (Martiniello, 1998). In fact, civic citizenship is merely an incomplete form of European citizenship. In this regard, it is however interesting to note that Marshall describes citizenship as a developing institution; he contends that the attribution of the above rights forms part of a historical process. Throughout history, citizens first obtained civil rights,

² There are a few exceptions to this rule; a number of countries – or regions – allow third-country nationals to vote in local elections; for example Belgium, Sweden, the Netherlands, North-Rhine Westphalen Germany etc.

political rights were only granted in the nineteenth century, whereas it took until well into the twentieth before social rights were incorporated in the status of citizenship. For the time being, civic citizenship has skipped the middle step. Considering that the interpretation of civic citizenship has been prone to change since its inception, it is not unthinkable that its features would ever change in the (distant) future. As such, it is worth emphasizing that Marshall notes that “societies in which citizenship is a developing institution create an image of an ideal citizenship against which achievements can be measured and towards aspirations can be directed. The urge forward along the path thus plotted is an urge towards a fuller measure of equality” (Marshall: 150). In the European context, EU citizenship clearly qualifies as this ‘ideal’ form of citizenship. Following the ideas of Marshall, civic citizenship thus would ideally move towards, even coincide with European citizenship, in the sense that both would attribute exactly the same rights. That ideal fully resounds with the Tampere call for an approximation of rights between European citizens and third-country nationals.

In reality, it is however unclear in what direction the concept is evolving. Indeed, the Commission currently does not seem to know whether it wants civic citizenship to be (come) a formal status in its own right which in the future will guarantee the same rights as European citizenship, or merely a waiting room for naturalization. Already when introducing the concept in 2000, the Commission seemed undecided on the desirability to obtain member state nationality; the Communication on a Community Immigration Policy stated that “enabling migrants to acquire such [civic] citizenship after a minimum period of years *might* be a sufficient guarantee for many migrants to settle successfully into society *or* a first step in the process of acquiring the nationality of the member state” (Commission, 2000: 19-20, emphasis added by author). By using the *conditionalis*, the Commission moreover indicated not to be sure about the integration perspectives of such concept. Three years later, the Commission had however put those doubts aside. In its 2003 Communication on Integration, Immigration and Employment, the above ‘might’ had been replaced by ‘would’. In order to strengthen the integration capacity of civic citizenship, it even made the case for extending political rights to third-country nationals. The Commission argued that “from the viewpoint of integration, it is obvious that local franchise should derive from permanent residence, rather than from nationality” and that “granting long-term resident immigrants political rights is important for the integration process” (Commission, 2000: 23).

However, the Commission remained ambiguous on the question whether either naturalization or the status of civic citizenship would be most advisable for the purpose of integration. In the same 2003 Communication, the Commission repeated that “the Tampere objectives endorsed the objective that long-term legally resident third-country nationals be offered the opportunity to obtain the nationality of the member state in which they reside” and emphasized that “it is widely recognized

that acquiring nationality is a means of facilitating integration [...] Obtaining nationality is important [...] because it encourages a sense of belonging in national life. Nationality entitles the bearer to full citizens rights guaranteeing *de jure* participation in the political, civil, social, economic and cultural life of the Member State” (Commission, 2003: 22). In a written contribution from 2005, Commissioner Vitorino yet on the other hand emphasized how civic citizenship constituted an “irreplaceable instrument for integration”. He moreover claimed that this form of citizenship “offers an attractive package of rights to persons who reside in a Member State for a period of five years or longer” but was not intended to grant “a separate set of rights for third-country nationals but rather a common baseline of rights and obligations shared by all residents in the European Union, irrespective of their nationality” (Vitorino, 2005: xvii) As such, the notion of civic citizenship is clearly resembles the notion of post-national membership as developed by Yasmine Soysal (Soysal, 1994). Building on the work of sociologist John Meyer who points to the spread of international norms regarding state obligations and universal rights, Soysal argues that individual rights do not, or rather should not flow from conventional citizenship but are derived from ‘post-national’ and universal rights of personhood. Soysal believes that immigrant participation in the host society primarily depends upon institutional arrangements such as citizenship. Thus, she contends that the establishment of a post-national form of citizenship will strongly benefit the integration process as the rights it embodies would motivate immigrants to actively take part in society.

The European Union currently counts no less than two forms of post-national citizenship. On the one hand, European citizenship for the nationals of member states, on other, civic citizenship for third-country nationals. Both forms of citizenship are indeed believed to promote the integration of their respective target groups. However, they seem mutually exclusive in their result. Authors like Andrew Geddes have claimed that the “creation of European citizenship has reinforced the exclusion of third-country nationals by affirming the importance of prior acquisition of nationality for access to free movement rights and access to social entitlements that at national level did not depend upon acquisition of nationality” (Geddes, 2000: 58), whereas the gradual strengthening of civic citizenship might over time make European citizenship superfluous.

This brings us back to the Commission’s dilemma on whether or not to promote naturalization over the formal status of civic citizenship. Instead of wondering whether European or civic citizenship offers the most optimal path towards integration, one should rather question the difference between civic and European citizenship *in se*. Considering that the Commission is trying to remedy the lack of mobility and political rights for third-country nationals, it may soon happen that both concepts overlap. As such, it seems sensible to incorporate the concept of civic citizenship within the concept of European citizenship. Theodora Kostakopoulou

indeed argues that “the constitutional significance of European citizenship does not lie in what the institution is at present but in what it might be or should be” (Kostakopoulou, 1999: 66). The fact that supranational institutions are now able to grant individual rights and obligations, however limited at first, shows that citizenship is no longer firmly anchored in the national–statist framework; as Catherine Withold de Wenden argues, “European citizenship, founded on the reciprocity of rights between Europeans of the Union, opens a constitutional chiasm in the practice of citizenship which yesterday was reserved for nationals” (Withold de Wenden, 1999: 94-95). In theory, the assignment of individual rights across borders under the ‘cover’ of European citizenship constitutes an open invitation for the European institutions to grant the same rights *beyond* the European borders. More than formal, *de jure* citizenship as a result of member state nationality, European citizenship could become a *de facto* status acquired by residence. In other words, European citizenship would be attributed on the basis of the territorial principle. Instead of a source of exclusion, European citizenship would thus become a source of integration for third-country nationals, granting all residents of the European Union the same, civil political and social rights.

For the sake of our analysis, it is however important to recall that civic citizenship currently may not attribute the same but still similar rights to all third-country nationals that are legally resident within the European territory. As such, civic citizenship closely resembles the civic-territorial form of citizenship as described by Koopmans and Statham (first dimension) and can therefore be used as indicator to situate the European integration model within their two-dimensional, conceptual space. The underlying cultural obligations of civic citizenship (second dimension) will be discussed in the second part of this article.

Cultural rights and integration

An important set of rights that have so far been overlooked in the discussion, are the cultural rights – and obligations – of citizens. In order to determine how the European approach should be situated within the conceptual space of Koopmans and Statham, it is however imperative to analyse which cultural paradigm underlies the European notion of integration. Which cultural expectations are implied in the concept of civic citizenship? Where are they situated on the axis as regards the cultural dimension of civic citizenship? Do they bear the stamp of cultural monism or are they rather of a pluralist nature? In the following paragraphs will become clear that it is no sinecure to formulate a straightforward answer to these questions as the European approach to integration contains a curious mix of elements, which makes it difficult to qualify the EU model under either of these headings.

When integration policy was first placed on the European agenda during the Tampere Council in 1999, the heads of state and government only gave little guidance as to how they understood a 'more vigorous integration policy' at European level. On the one hand, they insisted on the approximation the rights of third-country nationals, on the other, they emphasized the importance of "enhancing non-discrimination in economic, social and cultural life". As mentioned, the first element was clearly inspired by the ubiquitous idea that a secure residence status and equal treatment are crucial instruments for integration (Groenendijk, 2004). The second, however, reminds of the past race relations regime in Britain, based on "the genuine impulse to eradicate anti-discrimination and to spread equal opportunities to disadvantaged ethnic minorities" (Joppke, 1996: 480). This focus on anti-discrimination long dominated British thinking on ethnic relations policy. By means of three Race Relations Acts (1965, 1968, 1976), the British government created a comprehensive legislative framework to combat all direct and 'indirect' forms of discrimination. Similarly, the European Commission, in response to the Tampere mandate, submitted a package of proposals to combat discrimination in November 1999. Only months later, the Council adopted both the proposed 'Directive combating discrimination on grounds of racial or ethnic origin' and the 'Directive on anti-discrimination in employment on the grounds of religion or belief, disability, age or sexual orientation.'

In view of the Commission, integration policy should however go beyond anti-discrimination measures. It emphasizes that "successful integration of third-country nationals to maintain economic growth and social cohesion is one of the major challenges which the EU faces with regard to immigration policy" (Commission, 2000, 11). Echoing the objectives of the Lisbon Agenda, it is clear where the Commission found inspiration for this argumentation. Aware of the fact that most member states still primarily regard the European Union as an economic construction, the Commission seemed to believe that its argument for a more holistic approach to integration at the European level was likely to attract more support from national governments when framed as an important contribution to reaching the Lisbon targets (see for example, Commission, 2005, 3). At the Lisbon Summit in the spring of 2000, EU leaders had unveiled a bold strategic plan calling for a "radical transformation of the European economy" to make the EU into the most "competitive and dynamic knowledge-based economy in the world by 2010" (Lisbon Agenda, 2000). This so-called Lisbon Agenda has been welcomed by both officials and academics not only as the key to increasing the economic competitiveness of the European Union, but also as an effective route to improved social cohesion through better social protection and a 'modernised' European Social Model. Faced with a rapidly ageing population and growing labour shortages in both skilled and unskilled jobs, the Commission was – and is – convinced of the idea that the envisioned growth could never be achieved without opening new channels for

economic migration. However, aware of the mounting societal tension between second or third-generation migrants and part of 'indigenous' population, the Commission seemed cautious not to make the same mistakes as in the past; it therefore underlined that "EU immigration policy must therefore incorporate steps to ensure that migrants benefit from comparable working and living conditions to those of nationals. Failure to provide resources necessary to ensure the successful integration of such migrants and their families will in the long-term *exacerbate* social problems which may lead to exclusion and related problems such as criminality and delinquency (Commission, 2000: 19, emphasis added by the author). Integration policy was thus very much considered the natural complement of immigration policy. According to the Commission "it is not possible to develop an integrated approach to immigration without considering the impact of migration policies on the host society and on migrants themselves. The social conditions which migrants face, the attitudes of the host population and the presentation by political leaders of the benefits of diversity and pluralistic societies are well vital to the success of immigration policies; therefore, and the two aspects are intrinsically linked, the communication will also touch upon integration policy in the context set out in Tampere, namely fair treatment of third-country nationals residing legally in the Union and the *promotion of diversity*." (Communication, 2000: 5-6)

This last sentence deserves special attention; what does the Commission mean by 'promoting diversity'? Should this statement be interpreted as a vague hint to multiculturalism? Does it express the belief that the integration of (immigrant) minorities should proceed by means of recognizing the culture that constitutes a minority as a distinct group? As a doctrine for integration policy, multiculturalism indeed posits that the cultural recognition of groups, though the attribution of group rights and the adaption of general rules, is crucial to successful inclusion (Castles, 1994). Given its reputation as a pro-migrant actor (Geddes: 140), it would surely not be unthinkable that the Commission would be favourably disposed towards the ideas of multiculturalism. However, a clear difference should be made between multiculturalism as a reality and multiculturalism as a policy paradigm. In practice, the EU obviously is multicultural. And the Commission acknowledges this fact: "The European Union is by its very nature a pluralistic society enriched by a variety of cultural and social traditions, which in the future will become even more diverse" (Commission, 2000: 5). However, the European Union does not pursue a multicultural policy; though the European Council in the Hague Programme – the successor of the Tampere Programme from 2004 – underlines the need to "respect fully the language and culture of migrants and to safeguard the right to practise their cultures and religions subject to compliance with human right standards" (The Hague Programme, 2004), the EU integration policy stops short of taking affirmative action. As such, the European approach is in line with the ideas of Jacob Levy. Levy warns for a 'multiculturalism of fear' in which the recognition of cultural rights

'terrorizes' the process of policy-making. Instead, he suggests taking diversity as an inevitable fact of life, not as a goal to be furthered by state policy (Levy, 2000: 32). Other scholars, such as Ryszard Cholenwinski, regret this decision; he argues that "genuine and successful integration requires this additional element [of positive action] and that, without it, EU integration policy actually focuses more on adaptation, or even assimilation, of migrants to the host society rather than respecting, recognizing and celebrating cultural diversity, which it purports also to cover, though in somewhat rhetorical terms" (Cholenwinski, 2005: 713).

Still, it is worth noting that the Commission does not fully exclude any form of cultural adjustment. As part of its guidelines on education and integration, it for example argues that schools "can encourage pluralism and diversity" and that "the systems themselves must adjust to manage increasing ethnic, cultural and religious diversity amongst their pupils". In this context, the Commission suggests to ensure a reflection of diversity in the curriculum (Commission, 2005: 18). More generally, it states that "the longer term the objective of integration policy should be to enable migrants to access existing services and to ensure that these take into account their specific needs" (Commission, 2003: 19) Rather than acknowledging the recognition of cultural difference as a coercive right, the Commission hence takes a more pragmatic approach to cultural accommodation.

It is however not primarily the lack of affirmative action that sets the European approach apart from multiculturalism; another important difference regards the 'direction' of integration. In his book on multiculturalism and pluralism, Sartori criticizes the 'unilaterality' of cultural recognition (Sartori: 2000) Building on this criticism, Joppke underlines that "usually, the demand is for the state and majority society to recognize the minority group, while undeniably less attention is paid to a reciprocal obligation of a 'minority' to recognize the ways of the majority" (Joppke, 2004: 242). No theory of multiculturalism posits the act of recognition as reciprocal. The European notion of integration radically departs from this principle; both Commission and Council explicitly describe integration as "a two-way process involving adaption on the part of both the immigrant and the host society." (Commission, 2000: 19) Elaborating on this notion, the Commission explains how "there must be respect for cultural and social differences but also for our fundamental shared principles and values; respect for human rights and human dignity, appreciation of the value of pluralism and the recognition that membership of a society is based on a series of rights but brings with it a number of responsibilities for all of its members, be they nationals or migrants." Instead of multiculturalism, the European approach thus rather tends to pluralism. Giovanni Sartori indeed argues that pluralism in the political realm is emphatically not multiculturalism (Sartori, 2000). Pluralism requires voluntary group membership, multiple affiliations in the context of cross-cutting cleavages and a 'reciprocal recognition' between conflicting parties. These conditions are systematically denied

by multicultural politics, “as it evokes and mobilizes around involuntary and mutually exclusive statutes and tends to render ‘recognition’ a one-sided act by the majority society only” (Joppke: 238). Given the diverse cultural composition of its population, if only for the cultural differences between member states, the European Union of course allows for a variety of cultural patterns within its territory; one of the common basic principles explicitly underlines that “the practice of diverse cultures and religions is guaranteed under the Charter of Fundamental Rights” (CBP 8). What makes the European approach truly pluralist is its reciprocal approach to integration; integration is not a one-way street but expects a joint effort of both majority (EU citizens) and minority (third-country-nationals). Obviously, there are limits to cultural pluralism, which in Western societies are usually connected to the respect of individual human rights or notions of equality (Koopmans and Statham: 21).

Conspicuously, the European Union imposes another boundary to pluralism. In addition to human rights, it explicitly demands respect for European values. One of the common basic principles emphasizes that “integration implies respect for the basic values of the European Union.” The JHA Council even composed a concrete list of values that all member states adhere to: human rights standards, liberty, democracy, the rule of law, dignity, freedom, equality and non-discrimination, solidarity, citizen's rights and justice. (Council, 2004a: 19) This obviously raises the question what makes these values so distinctly European. In this context, Christian Joppke observes that governments increasingly try to “commit and bind newcomers to the particular society that is receiving them, notionally making them familiar with the ‘British’ or ‘Dutch’ values and ways of doing things.” However, he argues, “if one looks closer, these particularisms are just different names for the universal creed of liberty and equality that mark all liberal states” (Joppke: 253). The same applies to these so-called European values; there is nothing intrinsically ‘European’ about them; they merely represent the universal values of liberalism as shared by all Western countries.

Joppke links this increasing attention for ‘national’, ethno-cultural values to the rise of civic integration programmes across Europe. The same trend can be observed at European level. When presenting its list of so-called ‘European’ values, the Council emphasized that “views and opinions that are not compatible with such basic values might hinder the successful integration of immigrants into their new host society and might adversely influence the society as a whole. Consequently successful integration policies and practices preventing isolation of certain groups are a way to enhance the fulfillment of respect for common European and national values” (Council, 2004a: 19). Already in 2000, the Commission more concretely made a case for complementing the legal framework on discrimination with “specific integration programmes at national, regional and local level” (Commission, 2000: 19). In subsequent communications, it more specifically focused on the

importance of civic orientation courses as part of introduction programmes. These courses should help newly arrived third-country nationals to acquire basic knowledge about the language, institutions, socio-economic features, cultural life and fundamental values of their new host-country. They first and foremost serve a pragmatic purpose, providing newcomers with “a better start on their way to self-sufficiency” (Commission, 2005: 16) However, the increasing emphasis on European values also flags an normative concern over the (cultural) compatibility between the immigrant and ‘host’ populations and gives the European understanding of integration policy a more ‘assimilationist’ touch.

As such, an interesting parallel can be drawn between developments at national and European level. Over the last decade, a growing number of European countries have introduced mandatory civic integration programmes for newcomers. The exact content and scope of this practice yet remains under discussion (Brubaker, 2001; Jacobs and Rea, 2007). Recently, the debate has been extended to the European level; member states no longer merely wanted to discuss their integration policy at national level but also grew interested in exchanging ideas with other member states. The Commission indeed notes that “the current discussion at EU level concerning integration requirements reflects the political importance which member states assign to the successful integration of third-country nationals. A major area of debate concerns the nature of integration programmes and the kind of integration measures which should be provided” (Commission, 2003: 8). It should however be noted that certain member states weigh more heavily on the discussion than others. Some countries have used the ongoing debate at European level as an opportunity to upload their own policy preferences. Particularly the Danish and the Dutch Presidencies played an important role in that regard. As attention for integration policy had plummeted in the aftermath of 9/11, the Danish Presidency in 2002 made a distinct effort to put integration back on the European agenda. With mandatory integration programmes being a national priority, the Danes ensured that this element was taken up at European level. The Danish emphasis on work as crucial condition for integration also resounds in the European approach (MPI document); access to employment is still considered the first requirement for integration – CBP 3 (Commission, 2005: 16). Conspicuously, Danish influence indirectly continued after the end of their presidency. In an attempt to firmly anchor their priorities on the European agenda, the Danish government proposed to detach one of their national officials to the Commission. This person eventually became the main responsible for developing the integration strategy of the Commission between 2003 and 2005; she wrote the ‘Communication on Immigration, Integration and Employment’, helped compiling the ‘Annual Reports on Migration and Integration’, started the network of National Contact Points on Integration’, etc. In an interview, she confirmed that her Danish background certainly functioned as source of inspiration in that regard (Interview Commission official, March 2010). A

second impetus came from the Dutch Presidency in 2004. At the insistence of Rita Verdonck, the national minister of integration, the Dutch took the lead in formulating the 'common basic principles for integration' as demanded under the Greek Presidency (2003). Obviously, the Dutch seized the opportunity to put their stamp on these principles, hence the strong emphasis on the importance of civic integration programmes. The Netherlands was the first European country to introduce mandatory programmes for newcomers in 1998 (Law on Civic Integration for Newcomers) The French Presidency, by voice of President Sarkozy, later also tried to 'upload' the French '*contrats d'accueil et d'intégration*' (CAI). During the 2008 Interministerial Conference on Integration in Vichy, the French launched the idea of introducing 'European integration contracts', but that idea never came through. In general, it should thus be clear that certain countries used the European level as a platform to export their own ideas on integration policy (Interview, Dutch policy official, March 2010).

It is worth discussing these developments in relation to the broader, academic debate on integration models. In recent years, scholars bluntly announced 'the retreat of multiculturalism' (Joppke, 2004) and the 'return of assimilation' (Brubaker, 2001). According to Joppke, there are three important causes for the relapse of distinctly multicultural policies. First, he mentions the lack of public support for these policies, which he is by the success of (extreme) rightwing parties across Europe. Second, he refers to the shortcomings of such policies with respect to the socio-economic marginalization of migrants and their children. Statistic evidence on the subordinate position of (second- and third generation) migrants on the labour market and in the education system reinforced the realization that recognition policies did not take away socio-economic differences (see for example the famous article 'The multicultural drama' of Paul Scheffer (2000) on the situation in the Netherlands). And last but not least, he emphasizes the new assertiveness of the liberal state in imposing the liberal minimum on its dissenters. Joppke argues that "with its new stress on civic integration [...], the state is becoming more assertive about its liberal principles and shows itself less willing to see them violated under the cloak of multicultural toleration" (Joppke: 252). Brubaker perceives this new assertiveness as a shift to assimilation. However, the concept of assimilation should in this context be divested from its old connotations. The 'assimilationism' that Brubaker describes does not posit the complete absorption of ethnic minorities but instead refers to 'a process of becoming similar'. It is also based on the assumption that change does not occur in one person but happens over several generations. And most importantly, it implies a shift in the underlying, normative concerns of integration policy from cultural to socio-economic matters. Brubaker contends that "a general openness to cultural diversity, coupled with confidence among specialist – if not always the wider public – in the continuing robustness of processes of linguistic acculturation has alleviated anxieties about the

cultural dimension of assimilation” and that instead, the marginalization of certain groups is becoming the main issue of concern. (Brubaker: 542-543).

The European approach to integration policy reflects these general trends. The most important objective of European integration policy has always been to create comparable living and working conditions for third-country nationals as to prevent their marginalization. Simultaneously, the focus on European, or rather liberal, values, takes a prominent place within the European approach. In the conclusion will become clear how this affects the position the European integration model within the conceptual model of Koopmans and Statham.

Conclusion

In search of a conceptual model to analyse the European approach to integration policy, this article first looked into the available literature on integration models. Given its two-dimensional and nuanced approach, particularly the model of Koopmans and Statham seemed interesting to guide our research. Like most existing typologies of integration models, Koopmans and Statham however depart from the concept of citizenship. As such, this model initially seemed of little use to examine integration policy at European level. European citizenship cannot be considered as a full-fledged equivalent to national citizenship; it merely is a derivative of the latter. The European institutions, in contrast to national governments, have no direct authority to attribute this form of citizenship. Considering that only non-EU citizens form the target group of the European integration policy, it therefore appears that the concept of European citizenship would be useless for our analysis. Undoubtedly aware of the limitations of European citizenship, the Commission however launched the concept of ‘civic citizenship’ as an alternative tool to promote the integration of third-country nationals. In that capacity, the concept of civic citizenship was used as stepping stone to situate the broader integration model of the European Union within the ‘conceptual space’ of Koopmans and Statham. Different from previous models, their typology is built up around *two* dimensions of citizenship; one axis relating to the cultural obligations of citizenship, ranging from cultural pluralism to cultural monism, the other concerning the formal basis for citizenship, with on the one hand ethno-cultural bonds and on the other, the territorial principle as crucial criterion for nationality attribution.

In terms of the formal dimension, civic citizenship clearly resorts under the territorial principle. After five years, all third-country nationals that are legally resident within the European territory should be able to enjoy the full package of citizenship rights offered under this concept. Conspicuously, the rights attached to civic citizenship nowadays closely resemble those enjoyed by European citizens, with the exception, political and mobility rights. As such, this article raises the

question whether it would not be interesting to replace the concept of civic citizenship by a broad and inclusive concept of European citizenship, which would be granted on the basis of the territorial principle. With regard to the cultural axis of citizenship, the European approach rather tends towards pluralism; the recurring emphasis on cultural diversity implies a genuine acceptance of different cultural patterns, both amongst European and civic citizens. Taking both dimensions together, one could thus conclude that the European model is situated on the crossing between the pluralist and the civic-territorial axis. However, this conclusion overlooks the increasing attention for civic integration programmes at European level. However, this seemingly 'assimilationist' element does not imply an evolution towards a more ethno-cultural understanding of citizenship; even though these civic integration courses explicitly aim to promote 'European values', the ethno-cultural connotation of this practice is largely undermined by the fact that these so-called European values in fact represent nothing but the universal, civic values of liberalism.

As such, integration policy at the European level mirrors earlier policy shifts at the national level. Academics even proclaimed 'a return of assimilation' (Brubaker) and 'a retreat of multiculturalism' (Joppke). However, both statements are less blunt as they may sound; the assimilation that Brubaker describes is different from the 'old' assimilationism; it does no longer expect complete cultural adaptation but instead focuses on creating more similar socio-economic conditions for migrants, like the Commission predominantly aims to achieve. And even though the European integration policy stops short of granting specific group rights, the multicultural legacy lives on in the plea of the Commission to adapt services, where necessary, to the existing societal diversity. In short, European integration policy is thus a curious mixture of various influences, which only seems to confirm the argument that it is no longer possible to classify existing integration policies within fixed, national models (Joppke, 2007)

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