European Immigration
A Sourcebook

ASHGATE

Chapter 27

Concluding Remarks[1]

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According to the latest data presented by the EU Commission (European Commission, 2006, p. 3), on 1 January 2003, 15.2 million persons residing in the 25 Member States were third-country nationals. This amounts to 3.35 per cent of the total EU-25 population. Moreover, the two million population increase that was registered in the EU-25 in 2005 was mainly due to registered net immigration of 1.7 million. Positive net migration has been recorded in almost all Member States with the exception of Estonia, Latvia, Lithuania, the Netherlands and Poland, while Cyprus, Spain and Ireland registered the highest rates.

Although such generalized information is useful in providing us with the global picture of migration trends, what the preceding chapters of this book have highlighted is that it is nearly impossible to provide accurate information on the size and nature of the third-country nationals' population in the EU. Available statistics do not offer a consistent and reliable numerical picture of immigrants within the EU. Each Member State uses different sets of statistical categories, different definitions, different ways of recording residents and citizens. Stocks and flows of immigrant populations (presented in the preceding chapters) are rarely, if at all, directly comparable.

Despite these difficulties in developing a meaningful comparison between the countries studied in this volume, we have to note that a basic trend is common across the EU: the past few decades have been characterized by significant population movements across and within the European continent. Europeans have increasingly migrated from east to west and people from around the world have increasingly migrated to EU Member States. All Member States, regardless of their geographical and population size, and irrespective of previous migration history, have experienced population movements that have altered the EU demographically, socially and – all the more so – politically. Migration is the main determinant of demographic growth in the EU and will unquestionably have far-reaching consequences and implications for the socio-cultural landscape of Europe, as well as for its labour markets and economies.

The 25 country chapters of this book provide a brief presentation of the immigration situation in each of the European Union Member States, the size of their immigrant population and recent trends of inflows and outflows. Each chapter has commented upon the different definitions of migration categories in the national policies as well as the different types of migration statistics kept by each country. Each chapter has also offered a brief overview of migration policy developments during the last 15 years or so and has outlined the main provisions and conditions for the participation of immigrants in public life. Last but not least, each chapter has discussed the main media and political debates in relation to migration.

Against this background, this chapter highlights and discusses critically some aspects of the national studies with special reference to a typology of countries (in relation to their migration experience), a typology of migration pathways, and a typology of migration regimes. These typologies constitute a first attempt to provide an overview and to compare different EU countries

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1   This chapter draws from Cyrus et al. (2006).

without over-generalizing and with a view to recognizing and taking into account their different migration experiences. In other words, our aim in this chapter is to draw some comparative readings of the trends and issues currently characterizing EU migration patterns, while also pointing out some of the most marked differences.

Comparing experiences of migration

In this section, we propose a provisional typology (see Table 27.1) of migration experiences among EU countries which takes into account the following factors: relations between sending and receiving countries (for example, colonialism), past migration experience (earlier or recent conversion from senders to hosts, experience in migration management and integration policies), the size of the immigrant population (in absolute and relative terms, that is as percentage of the overall population), and the factors that have triggered migration flows (geopolitical changes, political or economic factors).[2]

Old host countries

During the first decades of reconstruction following the end of the Second World War, northern and western EU Member States shifted from being senders (for instance to the USA, Australia or Canada) to becoming hosts. France, Germany, Belgium, the Netherlands and the UK in particular have a relatively long immigration history related to their colonial past but also due to labour shortages after the end of the Second World War. These countries ran state or company-led recruitment schemes from Southern Europe as well as northern Africa, Asia and the British Commonwealth. Austria and Denmark joined this group more recently (since the 1970s) even though they have no special colonial ties to any countries. The migration pattern they have experienced is similar: economically motivated migration with migrants and their families gradually settling in large numbers.

At present, these countries are generally faced with ageing first-generation immigrants and the challenge of combating the social exclusion and marginalization of second- or third-generation immigrants. In parallel, the economic difficulties, or even crises, that characterize most of these economies and the accompanying social frustration are manipulated by extreme right-wing parties to gain voters. This has been steadily leading to the exacerbation of xenophobic reactions on the part of the majority populations. Religion, in particular Islam, is also becoming increasingly visible as a dividing factor between 'native'[3] populations and those of immigrant origin. These countries certainly have a long experience in migration and admission policies and have arguably developed elaborate (more or less successful) integration policies.

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2   This typology pays less attention to the new forms of migration (King, 2002) (for example, shuttle migration, gendered migration, youth and study migrations, co-ethnic movements, asylum seekers under humanitarian protection) and to special aspects of a country's legislation related to co-ethnic returnees for instance. These aspects are discussed in the section on migration pathways.

3   The term 'native' is used in inverted commas to note that populations of immigrant origin are also often natives of the country of settlement.

Table 27.1   Typology of countries in relation to their migration experience

Category	Type of migration pattern	EU Country
Old hosts	• Long migration history • Sizeable migrant population • Initially economic migration later followed by family reunification • Currently: only high skill migrants welcome, limited low skill programmes for specific sectors • Advanced integration policies and relatively liberal citizenship policies • Public debates on migration are politicized and mainly concern the dilemma between multiculturalism and assimilation	Austria, Belgium, Denmark, France, Germany, the Netherlands, Luxembourg, Sweden, United Kingdom
Recent hosts	• Countries on the geographical periphery of Europe • Transition from emigration to immigration in the late 1980s or early 1990s • Large immigrant populations developed quickly • Ad hoc immigration policy planning (marked by repeated regularization programmes in the Southern European countries) • Limited and still hesitant integration policies • Public debates on migration focus on control, criminality, fears of losing national cultural authenticity	Greece, Italy, Portugal, Spain, Ireland and Finland
Countries in transition	• Former communist countries in Central Europe • Caught in between sending, receiving and being a place of transit for migrants • Performing well in terms of their economic and political transition to capitalism and democracy • Small legal immigrant populations but potentially growing undocumented immigration from Eastern European states outside the EU • Non-existent integration policies, debates on immigration are very limited	Czech Republic, Hungary and Poland
Small islands	• Very small island countries facing increasing migration and asylum-seeking pressures • Ad hoc immigration policy planning and very limited integration policies • Still experiencing emigration of their own citizens • Public debates on immigration concentrate on fears of being 'inundated' by foreigners	Cyprus and Malta
Non-immigration countries	• Very low levels of new immigration whether legal or irregular • Important population changes and minority formation in the course of the 1990s, resulting from recent nation state building and ethnic unmixing (Brubakers 1996)	Estonia, Latvia, Lithuania, Slovenia and Slovakia

During the 1990s, a gradual shift took place towards increasingly restrictive admission policies,[4] and towards a revisiting of their own integration policies. In an environment of heightened security concerns, the value and success of multicultural citizenship policies adopted by most of these European countries has increasingly been questioned (Gropas, 2007). Recent trends in their integration policies are marked by new (and in many cases stricter) integration obligations towards new immigrants, for instance through obligatory language and civic orientation courses. A telling example is the case of the Netherlands where, as of 2005, immigrants coming for family creation must pass an integration test in the Dutch embassy in their country of origin. Also, the Dutch Government has recently announced plans to require tests of Dutch language proficiency and knowledge of Dutch culture for labour migrants applying for an entry visa.

Recent host countries

Over the course of the last two decades, countries on the geographic periphery of the EU have seen their traditional emigration patterns being reversed and have become destination countries. This is the case for Southern European states (Greece, Italy, Portugal and Spain) and for smaller countries in the western and northern periphery of the European Union (Ireland and Finland).

In part, this reflects a gradual improvement in the economic situation and the living conditions in these countries. It has also, however, been an unintended side effect of the restrictive immigration measures taken by the UK, France, Germany and Switzerland since the mid-1970s. Moreover, immigration patterns in these countries have been significantly affected by the implosion of the communist regimes in Central and Eastern Europe and the liberalization of population movements from east to west.

The immigration experience in this group has been characterized by the absence of consistent migration policies – that is, policies with a long-term approach to the issues of admission and integration. This has led to a high number of migrants remaining in these countries unofficially or without proper documentation and to high numbers of illegal immigrants. This is particularly the case in Southern European countries, which have land and sea borders that are difficult to patrol and control. The irregular or illegal status that is common to large segments of the migrant population has implications not only for their employment conditions but also for their effective integration in the host society.

The large inflow of undocumented immigrants that has been common to the southern Member States has led to repeated regularization programmes as governments gradually admitted that the immigration situation was getting out of their control and that large populations were present in the country illegally. Since 1986, there have been five such programmes in Italy involving more than two million immigrants, and Greece has implemented three similar programmes of which the most recent was in 2005. Since 1992, Portugal has adopted four regularization initiatives and Spain began its third and most far-reaching regularization scheme in 2005.

Finland and Ireland have also recently been transformed from countries of emigration to host destinations and the largest influx came with the end of the Cold War. Traditionally, Finland has been a country with very restrictive migration policies, mainly due to its geographical position (bordering with the Soviet Union during the Cold War), while Ireland's economic situation did not render it a destination choice for migrants. Political and economic changes in the 1990s altered this, leading to a significant change in the socio-demographic and economic landscape of both countries. Unlike the southern EU countries in this general category, Ireland and Finland have not

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4   Immigration policies in these countries had put a halt to recruitment of foreign labour since the mid-1970s as a result of the oil crisis and the slowing down of their economies.

been faced with noteworthy illegal immigration and they have been more proactive in formulating integration policies for the influx of newcomers and in particular for the integration of asylum seekers and refugees.

Countries in transition

The third group of countries experienced major changes in migration patterns since the 1990s fundamentally as a consequence of the 1989 'Autumn of Nations.' While these new EU Member States experienced large emigration towards the other EU states in the early to mid-1990s, they have also become transit migration countries and appear to be in the preliminary stages of becoming hosts of third-country immigrants. The inflow of immigrants is primarily from former Soviet Union countries (and in particular from Ukraine) or other neighbouring nations with which there was a formal relationship (for example between former Czechoslovakia and Yugoslavia).

In addition, small, albeit well organized, immigrant populations in these countries come mainly from Asia and in many cases are the continuation of migratory movements during the Communist times. Thus, we find small groups of Vietnamese or Chinese emerging in Poland or the Czech Republic. In addition, Central and Eastern European Member States have also become an attractive destination for entrepreneurs from Western Europe and the USA. These immigrants are predominantly involved in economic activities in the tertiary sector as highly-skilled managers, experts, consultants or scientists.

In all cases, the new Member States have encountered a series of challenges in the field of integration and administrative hurdles (lack of qualified personnel and financial means) in implementing integration initiatives and the national action plans for employment (European Commission, 2006, p. 7).

Small island countries

The islands of Malta and Cyprus have experienced increased immigration, both as transit and host countries, since the 1990s. Cyprus has received both legal and irregular migration in a pattern similar to that of Greece or other Southern European countries. Malta, by contrast, has been concerned with increasing amounts of illegal migration and growing numbers of asylum seekers and refugees who reach its coasts on wrecked dinghies from North Africa. What these two countries share is their small size, which makes even a few thousands or tens of thousands of foreigners a large population; their lack of previous experience with migration management and integration policies; and the developing xenophobic and racist attitudes among their populations. Debates in these countries frame migration in terms of fear and threat. At the same time, both island countries continue to experience emigration of their youth, who go to study abroad in other European countries and often remain there.

Non-immigration countries

For some of the former communist states, migration is still of minor importance. This is the case for the Baltic States, and also for Slovenia and Slovakia. With regard to the Baltic States, the previously steady migration flows from the former Soviet Union have generally ceased since the 1990s. Moreover, all three countries experienced a population decrease in the early to mid-1990s mainly due to the repatriation of Russian-speaking residents to Russia or other former Soviet states. These outflows have eventually levelled out after the first few years. The Russian speakers who chose to remain in these three countries have been turned into ethnic minorities through the

process of nation building. In the case of Lithuania, minorities were given citizenship status and are therefore recognized as ethnic minorities. In the case of Latvia and Estonia, many among the Russian speakers were unable to acquire citizenship status and have therefore been labelled as immigrants who are permanent residents in those countries. Theoretically, these populations may be considered immigrants but they are in most cases second generation (as it was their parents who moved within the Soviet Union) and have known no other country as their own. The linguistic issue, and in particular the question of education in minority languages, has been the main policy issue in recent years and the main topic of public debates on 'immigration'.

The situation of Slovenia resembles that of the Baltic States to a certain extent, as part of its population stems from internal migration from other states of former Yugoslavia. There again, nation state building has led to problematic citizenship policies which were further complicated by the war in neighbouring Croatia and Bosnia. Slovenian immigration has mainly to do with former Yugoslav citizens from Bosnia or Serbia who now reside in Slovenia with or without appropriate legal status.

Slovakia has also been grouped within this set of countries because it has also experienced virtually no immigration other than transit migration towards the west and because it has similarly been affected by nation building. Slovakia has accepted a number of Czech citizens but has also 'lost' part of its population which chose to stay in the Czech Republic and naturalize. Currently, debates about migration have mainly to do with the movement of Roma populations between Slovakia and the Czech Republic and are tainted by prejudice and racism against this ethnic minority, regardless of their citizenship.

All five countries in this group may be characterized as non-immigration countries, as they have experienced very little immigration or emigration in recent years, except for population movements related to nation building. The special nature of these cases is that populations did not actually move; it was the borders that moved over them after the end of the Cold War, thereby changing their status or requiring them to change their citizenship.

Immigration pathways

The existing diversity in immigrant populations within the 25 EU Member States is the result of the history of migration flows in Europe, specific political and economic configurations between sending and receiving countries, geopolitical circumstances, and national differences in immigration policies. Below, we provide for a typology of the main 'old' and 'new' forms of migration in Europe today. Our classification includes the old typical labour migrations that were triggered by economic inequalities between the sending and the receiving countries and were managed through recruitment schemes and bilateral agreements. It also attempts to encompass new forms of migration that are more fluid, often irregular, involve circular or pendular movements between several countries, and are related to specific economic sectors of seasonal or heavy jobs.

To provide a structured scheme for comparison and categorization, we use here the term 'migration pathways' borrowed from the work of Psimmenos and Kassimati (2003). The term 'pathways' suggests sets of relationships, policies and opportunities that come together to form a specific pathway, a channel through which information and people flow between the sending and receiving country.

Based on this understanding and following from a comparative reading of the 25 country overviews, we have identified eight such main migration pathways that are analysed in turn below: the pathway of co-ethnics and returnees, the colonial and post-colonial pathway, the pre-1989 internal migration pathway, the labour migration pathway, the asylum-seeking pathway,

the pathway of temporary and seasonal migration, the 'gold-collar' pathway and the pathway of irregular migration.

The pathway of co-ethnics and returnees

Favourable admission patterns for co-ethnics, returnees and their descendants are widespread across many Member States. In each case, preferential reception schemes are justified on the basis of unique historical circumstances and are excluded from general, restrictive immigration policies.

Two types of migrants can be distinguished within this pathway of migration: returnees and co-ethnics. Returnees are individuals born in the EU country, who have emigrated and have subsequently returned after a long absence abroad. Co-ethnics are descendants of emigrants or members of co-ethnic communities abroad who result from past migration movements. Co-ethnics may also be populations which are ethnically and culturally akin to the receiving country but which have never, in this or previous generations, lived in that country. In practice, the two categories are often merged, while the logic that regulates policies towards them is the same: they are of the same ethnic origin as the citizens of the receiving country.

While some EU Member States have a larger presence of returnees, other Member States have a higher proportion of co-ethnics. Poland is one country that clarifies this distinction; persons who emigrated from Poland as adults and returned to the country after the system transition (mainly from the USA) are considered returnees (also referred to as expatriates) whereas co-ethnics are the descendants of settlers and deportees, mainly from Kazakhstan. In the case of Germany, immigrating co-ethnics (*Aussiedler*) come mainly from Kazakhstan, whereas in Finland co-ethnics come from Estonia. Greece has received co-ethnics (Pontic Greeks) from the former Soviet Republics of Georgia, Kazakhstan, Russia and Armenia, and a large number of ethnic Greeks from Albania. Portugal's *retornados* are the descendants of former Portuguese settlers and come mainly from Angola and Mozambique. Swedish Finns and mainly Ingrian Finns are currently regarded as return migrants with special status in Finland. Hungary is also a country with a high number of immigrants of Hungarian ethnic origin. Indeed, since 1989, immigrants and temporary workers are mostly from ethnic Hungarian communities beyond the borders of contemporary Hungary (for example Romania, Ukraine and former Yugoslavia). Another country that has experienced co-ethnic migration, albeit in small numbers, is Italy. Here, immigrants (mostly from Argentina) who can identify Italian parenthood up to three generations prior, are still considered co-ethnics and have a preferential channel to naturalization. Finally, there has been an inflow of returnees towards the Baltic countries in recent years. This migration predominantly consists of a high percentage of repatriated citizens (returnees) who returned to Latvia, Lithuania and Estonia when independence was restored.

In all cases, the reception of co-ethnics and returnees is better than that of 'other' immigrants. They usually enjoy the right to naturalize through preferential channels and, even if they do not have the right to naturalization upon arrival, they enjoy privileged conditions compared to other migrants as regards the financial and institutional support provided to them by the state with a view to helping them settle down and integrate into society as smoothly as possible.

The colonial and post-colonial pathway

This pattern mainly pertains to Member States with a colonial past, and seems to have worked as a de facto substitute for the recruitment of workers. This is particularly the case for the UK, France, the Netherlands and, to a certain extent, Belgium, Spain and Portugal. In these countries, immigrants were granted access to the territory as citizens of the former colonies, with certain

sets of rights associated with their status. The United Kingdom has received several immigrant groups from Commonwealth states of the West Indies, Asia and Africa, while France has received immigrants mainly from former African colonies (for example West Africa and the Maghreb). The Netherlands has welcomed former colonial subjects from Indonesia and Suriname, and Belgium has received migrants from its former African colonies such as the Congo (former Zaire), Rwanda and Burundi. Spain has large immigrant communities from Ecuador, Argentina and Peru, and the main countries of origin of immigrants in Portugal are Portuguese-speaking African countries (for example Angola, Cape Verde, Guinea Bissau, Mozambique), and Brazil. Initially, immigration from Africa and Asia mainly took place within the framework of post-colonial migration, but the receiving countries gradually put legal obstacles in place so as to curb post-colonial immigration.

In terms of immigrant integration, the colonial relationship has offered some advantages to the migrants in that they were usually familiar with the language, the culture, and even the institutions and political system of the colonial 'mother' country. It also brought with it important disadvantages such as prejudice, discrimination and racism that were built into the social and political system of the country of settlement and that were widespread among its population. Moreover, some colonial populations had had particularly traumatic and divisive experiences in their relationship with the mother country (for example Algerians in France) that could not be easily forgotten or settled (emotionally and politically) even if they lived in the mother country for decades.

Pre-1989 internal migration pathway

This pathway has mainly affected countries located in Central and Eastern Europe and the Baltic region. During Soviet rule, large population movements took place and, as a consequence, large numbers of Soviet citizens (mainly but not always of Russian nationality) settled in areas that became independent states after 1989. In these countries, internal migration movements were typical of the Communist era.

Communist countries in Europe had no migration relations with countries outside the Warsaw Pact. The governing regime tightly controlled emigration, and political reasons for emigration were often intertwined with economic motives. The Czech Republic (then part of Czechoslovakia) experienced immigration within the framework of 'international aid cooperation' schemes and the consequent intergovernmental agreements drafted between Czechoslovakia and other socialist countries including Poland, Yugoslavia, Hungary, Cuba, Mongolia, Angola and North Korea. In contrast, it is worth noting that there was hardly any immigration to Hungary between 1949 and 1989, with the exception of two politically motivated movements when Greek and Chilean communists were granted asylum protection in the early 1950s and 1970s.

Throughout the large-scale industrialization of the 1960s and 1970s, significant numbers of people from different parts of the Soviet Union (mostly from Ukraine, the then Byelorussia and Russia) settled in the three Baltic States. Because of nation state (re-)building, most of the settlers are now identified as foreign nationals. However, these populations are not the outcome of international migration but, rather, of formerly internal migration and the reshuffling of states and their borders.

What is common among these movements is that they all happened within the context of a centrally governed economy and an authoritarian society. They all resembled internal movements within some sort of 'empire' which was the communist part of the world. In some cases, populations that used this pathway to migrate were offered the opportunity to naturalize and to become fully integrated into their societies of settlement while, in other cases, naturalization has been very difficult and these groups remain labelled as foreign immigrants despite their long-term settlement in the receiving countries.

The labour migration pathway

This pathway includes two main patterns of movement that have historically been inter-related: initial labour migration that came as a response to labour recruitment by the receiving countries and, later, family reunification or family formation migration. This latter had to do with the settlement of the workers in their host country and their wish to bring their family over or to form a family with a person from the same country of origin.

The labour migration pathway is probably the numerically most important one in Europe today. It has been the dominant form of migration in Western and Southern Europe from the 1950s up to the present day. Recruitment programmes were implemented in the older host countries of Northern and Western Europe from the late 1950s until the early 1970s. These programmes, also known as guest-worker recruitment programmes, were established through bilateral governmental agreements mainly with Southern European and Mediterranean countries (such as Morocco and Turkey).[5] The recruitment was initially intended to be strictly temporary and recruited workers were expected to return to their country of origin. However, the return aspect of the agreements was not implemented in a strict and consistent manner. Instead, policies allowing for the repeated renewal of residence rights were commonplace. In the end, this led to settlement and subsequent family reunification migration. This has been the case for immigrants from Italy, Greece, Spain, Portugal, Yugoslavia, Turkey, Morocco and Tunisia who have settled predominantly in Germany, Sweden, France, Belgium, the Netherlands, Austria and Luxembourg. Although Italy, Greece, Spain and Portugal are EU Member States today and immigrants in these countries enjoy free mobility within the Union, immigration from the former Yugoslav states, Turkey and North Africa is still of third-country status. Today, family formation (marrying a partner from the parents' country of origin) is an important source of new immigration linked to this historical recruitment pattern.

The asylum seeking pathway

Since the mid-1970s, Western European countries have received three major migration flows from other parts of Europe that were initiated by political persecution and war. The first wave was from the socialist countries of Central and Eastern Europe. These migrants were perceived as legitimate refugees escaping communist suppression and received preferential reception until the end of the 1980s. Due to restrictive passport regulations in most socialist countries, the largest refugee migration came from the least restrictive Polish People's Republic. These migrants went primarily to Germany and secondarily to Italy, France and Greece when martial law was imposed in Poland in 1981.

The second most important refugee migration wave came from Turkey in the 1980s when members of the Kurdish minority and the religious minority of Alevits sought refuge predominantly in Germany, but also in Greece.

The third wave of asylum-seeking migration was a result of the civil war in former Yugoslavia. Between 1991 and 1995, hundreds of thousands of refugees arrived in Germany, the UK, France, Austria, Italy, Ireland, Sweden and Slovenia. These refugees only received temporary protection as civil war refugees and the majority have returned to their home country. However, a considerable proportion has remained in the receiving countries, among them Roma people who in particular have experienced problems of discrimination and intolerance in the countries of settlement.

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5   There were also some bilateral schemes with more geographically distant countries, such as the scheme linking Germany and South Korea.

From the mid-1970s until the early 1990s, the number of non-European persons applying for asylum increased drastically throughout all EU12 and EU15 (at the time) Member States. The majority of asylum seekers came from countries affected by political intolerance, ethnic conflicts and civil or international wars. Accordingly, the main regions of origin were Latin America (Chile, Columbia, Ecuador), Africa (Ghana, the Republic of the Congo, Nigeria, Somalia), the wider Middle East (Palestine, Iraq, Iran, Algeria, Morocco) and Asia (Socialist Republic of Vietnam, Sri Lanka, Afghanistan).

As a response to the constant rise in the number of asylum applications, by the mid-1990s some European countries had made the relevant regulatory frameworks and assessment criteria more restrictive. Germany, for example, has changed the respective article in its Constitution with a view to reducing the numbers of asylum seekers that selected Germany as their destination-country. This change has made provisions for asylum seekers who are legally identified as being from 'safe countries' to be returned to their country of origin. Changes in asylum-seeker reception policies in some countries have also resulted in the partial shift of asylum applications to other destinations. Thus, there is currently an increasing trend for asylum applications in Poland and other Central and Eastern European countries from Chechen refugees, for instance.

The pathway of temporary and seasonal migration

Temporary migration programmes have also been a permanent feature of migration regimes. The recruitment programmes of the 1960s were planned and propagated as temporary programmes, although not administered accordingly, and resulted in the settlement of recruited workers. After the recruitment stopped in the early 1970s, temporary programmes were used with greater reluctance in many countries. However, with the implosion of the communist regimes in 1989 in Central and Eastern Europe and the liberalization of population flows that resulted, older programmes increased in scope or new temporary programmes were introduced in order to find a legal way to respond to the pressure of migration.

Temporary immigrants from non-EU countries have responded to the structural imbalance of developed economies in Europe. They have occupied specific niches in the secondary labour market, becoming cleaners, home carers, construction workers and generally filling jobs in the lower-skilled, more labour-intensive and volatile sectors of the economy. Seasonal migrants have been a similar case, accepted mainly for jobs in agriculture and tourism or catering services. Temporary and seasonal recruitment programmes have been adopted by several EU countries (including for instance Austria, France, Cyprus, Greece, Italy, Germany and the UK). The aim was to provide a legal path for migrants to enter these countries and fill positions that were not taken by natives because they were low-pay, low-prestige jobs with difficult working conditions. Whether these temporary and seasonal labourers have remained temporary sojourners or have legally or illegally converted into long-term migrants is a question only half explored.

The 'gold collar' pathway

During the last 15 years there has also been increasing temporary and permanent immigration of highly qualified professionals such as managers, investors and business persons, researchers in academia and industry, engineers in multinational companies, sport professionals and people in the arts in the western and southern EU countries. This migration occurs to a lesser extent in the new Member States in the east. Immigration law often provides for preferential treatment for highly qualified people and even when there are no such provisions in the law, implementation practices

tend to be different when it comes to multinational company employees or highly qualified professionals. This group is also referred to as 'knowledge migrants' in the Netherlands.

Although some highly qualified migrants have received particular media attention and have used their position to defend the cause of other immigrants, the majority of these migrants seem to be largely invisible and are not considered part of the immigration issue. In recent years, the discourse in many countries has had a tendency to actively address the issue of attracting this 'gold-collar' immigrant labour force. It is perceived to be a major challenge for developed economies (especially of the larger EU Member States such as Germany, France and the UK) to attract and keep a part of this highly qualified, multilingual, internationally mobile cosmopolitan elite, in order to enhance the knowledge-based competitiveness of their economy. The UK for example has created the Innovators immigration category since 2000 to encourage the immigration of innovative entrepreneurs, and the Highly Skilled Migrant Programme since 2002 to supplement its labour market needs (European Commission, 2006, pp. 17–18). Numerically speaking, this pathway involves a rather limited number of immigrants in Europe today.

The pathway of irregular migration

A large percentage of new immigrants in EU countries are undocumented. Owing to either the gradual establishment of restrictions on migration or the absence of an appropriate migration policy, a proportion of the immigrant population currently has or has had an irregular or illegal status. Some have entered host countries illegally; others have entered with a valid visa or residence permit and have overstayed or abused their visa. Depending on the control regime of the receiving country, some undocumented migrants may only work in unregistered jobs in the shadow economy, whilst others may work in registered jobs. While old host countries generally reject regularization campaigns as an option and react with further internal controls to curb irregular migration, recent host countries have made regularization or the so-called 'amnesty' programmes their main axis of immigration policy. Gaps in the regularization laws, inefficient public bureaucracies, and the lack of incentives for employers to ensure or facilitate the legal status of many migrants have complicated the situation. This has led to the perpetual revitalization of this pathway, which is constantly re-fuelled by new irregular immigration or where migrants live in limbo, shifting frequently between legal and illegal status. In effect, a common story of many third -country nationals falling into this category involves illegal entry, later regularization of their status but, often, the inability to retain official status when their permit is due for renewal, for a variety of reasons ranging from lack of a proper work contract (that is full, formal employment with social security benefits, and so on) to not satisfying other requirements (for example, they risk bringing their family to the host country even if their family reunification application is rejected because their taxed income is not sufficient). This contributes to the marginalization and exploitation of a significant part of the immigrant labour force.

Comparing integration policies and practices

A comparative examination of immigrant integration practices regarding naturalization regimes, the granting of local voting rights and the extent of immigrant participation in the civic and political life of the host countries presents a rather disjointed picture. Immigrants encounter very different integration prospects and opportunities depending on the country in which they live, on the rights that may be linked to their specific country of origin and to their individual status, as well as to the implementation of rights at the local level.

A full comparative overview of the conditions and regimes for immigrant integration in the EU countries would go beyond the scope of our chapter. Therefore, we have chosen to address two topics that, we believe, are of crucial importance for immigrant integration and that may also be considered as emblematic of the 'integration philosophies' (Favell, 1998) currently present within the Union. Thus, we discuss the naturalization options and the different types of migrant status available to third-country nationals in the EU-25 and the question of local voting rights.

Naturalization and migration status regimes

All 25 EU Member States have participation regimes that distinguish between their own nationals, EU citizens and third-country nationals. As a rule, only own-country citizens enjoy full political and civic rights, while third-country nationals (non-citizens) are subject to different kinds of restrictions. Within the immigrant population, however, there are also numerous distinctions, depending on the status of the individual and the specific national group to which s/he belongs.

Most states have designed a variety of migration status levels for specific groups – temporary workers, asylum seekers, family members of settled immigrants, immigrants with renewable residence permits and permanent residents. Each type of permit may encompass a specific set of rights which more or less deviates from citizens' rights, and which changes from country to country, in spite of EU efforts (that is, the European Commission mainly) to define minimum conditions. While legal permanent residents sometimes enjoy full equality except for enfranchisement at the national level, undocumented workers may be de facto excluded from all rights or may only be allowed to access specific services such as emergency health care. Asylum seekers may be restricted in their mobility in various ways ranging from detention and an obligation to live in specified places, to being forbidden to leave a municipality or region.

Full political and civic rights and obligations may be acquired by immigrants from third countries through the naturalization process. Most EU states primarily base citizenship on ancestry (*jus sanguinis*) rather than on place of birth (*jus soli*), although most citizenship laws contain elements of both. Member States also differ in their acceptance of dual citizenship and, hence, their requirement for the migrant to abandon her/his citizenship of origin if s/he is to naturalize.

The naturalization process is long and complicated in almost all countries, requiring a very long list of documents that should accompany the application. Naturalization rules often also include vague conditions that are open to different interpretations during their day-to-day implementation by administrative personnel.

Eligibility for naturalization is basically defined on the basis of the length of stay. Other core determining factors include language proficiency, good character, sound mind and no criminal record. Acquisition of citizenship via marriage with a national of an EU Member State is subject to specific conditions, as are the procedures for refugees and asylum holders.

In practical terms this means that first-generation immigrants can request citizenship on the basis of length of residence in a country of the EU. Residence requirements vary between countries, but also in relation to country of origin and residence status (for example, EU citizens, adopted foreigners, refugees, stateless persons, non-EU citizens, and so on). Children born to immigrants in the EU are usually considered to be 'foreigners', even though many EU Member States have decreased residency and other naturalization requirements for 'second-generation' immigrants and have extended automatic citizenship for the 'third generation'. In most EU countries, refugees and foreigners with regular residence permits may request citizenship if they have permanently resided in the territory of the country for periods of between five and ten years.

Ireland is exceptional, as it granted unconditional citizenship to all children born in Ireland until 2004. Since 2005, automatic rights to children of immigrants have been abolished unless one

of the parents or grandparents has Irish citizenship or if the parent had been living in Ireland for three of the four years preceding the birth of the child. On the contrary, Greece holds one of the longest residence requirements in Europe. According to a policy which is currently under revision, immigrants are required to reside in the country for ten out of the past twelve years in order to be eligible for Greek citizenship.

In the CEE countries, the number of naturalizations was relatively high in the first half of the 1990s, reflecting mainly returning emigrants who had lost their citizenship while abroad. Since 2000, this number has been much lower. A specific situation was created in the newly formed Baltic States and Slovenia, where immigrants from other regions of the former larger unit were not granted citizenship. While there is some preferential treatment for gaining citizenship in the Baltic States, in the case of Slovenia, no special provisions have been made to recognize the sizeable community of citizens from other former Yugoslavian republics and war refugees who have resided in the country for many years. Between 18,000 and 40,000 people were 'erased' from the citizenship registers in the period immediately following national independence.

In Latvia and Estonia (but not in Lithuania) after the Restoration of Independence, all those who were not citizens of the country in the pre-1938 period were declared aliens and had to apply for naturalization. Requirements for the naturalization procedure included five years of residence, a legal source of income, and a thorough knowledge of both the constitution and the state language. Indeed, language became the main obstacle (and contested issue) for naturalization as these 'internal migrants' from other parts of the Soviet Union were Russian speakers and had not needed, nor had they been required during Soviet times, to learn the language of the country in which they settled. While alienating some of their residents, the Baltic countries welcomed emigrants who wished to return and who could prove their link to the country through their own or their parents' citizenship of the pre-1938 states.

Most of the immigrants who arrived in Latvia and Lithuania during the Soviet period have now been naturalized, but the situation is more difficult in Estonia. The annual number of naturalizations has grown smaller, and the majority of the people who have received citizenship in recent years have been children.

In fact, for many countries of Central and Eastern Europe, naturalization policies appear to be more strongly shaped by concerns about expatriates, diasporas and ethnic kin minorities in neighbouring countries than by immigration. It should be noted, however, that a number of older EU Member States, have also long pursued policies of preferential access to citizenship for persons who are considered ethnic or linguistic relatives. This is the case for Germany, Portugal, Spain, Italy and Greece. Germany awards German citizenship immediately to ethnic Germans from the former Soviet Union who have been accepted as co-ethnics in the application procedure, as does Greece with Pontic Greeks from the former Soviet Republics. Spain reduces the ten-year legal residence requirement for naturalization to two years for persons from countries that hold special cultural and historic bonds with Spain such as Andorra, the Philippines, Equatorial Guinea and most Latin American countries. Portugal also has a preferential regime for Portuguese-speaking countries, since PALOP nationals require a minimum of a six-year residence permit to be eligible, whereas a minimum of ten years is required for other third-country nationals.

The different migrant status and naturalization regimes of each country result in different distributions between nationals and non-nationals in each country. In other words, in some countries a large part of the migrant population has naturalized and disappeared from the migration registers. Sweden is illustrative of this, where approximately half of all foreign-born persons residing in the country for five years or more become Swedish citizens. In other countries, even second- or third-generation migrants remain aliens. Some countries continue to keep a record of their naturalized

foreigners and/or generally of their population that has some foreign ancestry (for example France and the Netherlands) while other countries do not (for example Germany and the UK).

Local voting rights

We have chosen to discuss local voting rights here as these are the most advanced political right conceded to non-nationals in some countries. While voting in national elections remains the privilege of citizens,[6] some countries have offered to third-country nationals the possibility to vote and also stand for office in local elections. More specifically, there are three variations of this policy: the denial of voting rights at the local level; the granting of the right to vote but not to stand as a candidate in local elections; and the granting of full political rights, active and passive (see table below).

Table 27.2   Voting rights for third-country nationals in EU Member States

Political rights	EU Member States
No local voting rights	Austria, Cyprus, Czech Republic, France, Germany, Greece, Hungary, Italy, Latvia, Lithuania, Luxemburg, Poland
Granting of voting rights but not of the right to stand as candidate	Belgium, Estonia
Full voting rights at the local level conditional to the fulfilment of special requirements	Denmark, Finland, Ireland, Netherlands, Malta, Portugal, Slovakia, Slovenia, Spain, Sweden, UK

Source: Table 2 in Cyrus et al. (2006: 80); see also POLITIS project country reports (http://www.uni-oldenburg.de/politis-europe/index.html).

Nearly half of the EU Member States belong to the first group of countries, those that do not grant voting rights at the local level to their resident foreign population. Altogether 12 countries strictly deny local enfranchisement. But the fact that these countries deny immigrant voting rights at the local level does not mean that the issue is not part of the political debate. In those western countries with a higher percentage of immigrant population, such as Luxembourg, Italy, Germany or Austria, the introduction of voting rights for immigrants was at one moment or another a significant issue on the political agenda. While the Government of Luxembourg did not even consider the matter, legislators in some of the other countries took the proposal to enfranchise foreign residents more seriously, though ultimately did not adopt relevant legislation. The case of Germany, with its federal constitution, is illuminating. Here, some of the federal states had passed a law that foresaw the voting right for resident non-EU nationals. However, the project was cancelled after a court ruling by the Federal Constitutional Court in 1994, which underlined the fact that the right to vote at every level of political decision-making is perceived to be the exclusive privilege of citizens. The only way to acquire political voting rights is through the acquisition of citizenship.

Two countries, Belgium and Estonia, have introduced a reduced voting right at the local level that gives resident non-EU citizens the right to vote but not to stand for elections. In the case of

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6   With some small but notable exceptions related to each country's history (for example citizens of Commonwealth countries in Britain).

Belgium, where voting is compulsory for citizens, the enfranchisement of foreign nationals at the local level was due to come into force for the first time in 2006. The main requirement is to maintain a legal residence for at least five years. The regulation is a response to the claims of immigrant associations and their supporters for local voting rights. In the case of Estonia, foreign citizens and stateless persons – here the relatively large group of former Soviet citizens who lost their citizenship with the formation of the Estonian nation-state – are entitled to vote in local council elections if they hold a permanent residence permit and have resided legally on the territory of the corresponding municipality for at least five years by January 1st of the election year. However, the right to stand as a candidate is reserved to Estonian citizens.

At the time of writing (2006) at least 11 EU Member States have enfranchised the resident foreign population at the local level. Local voting rights were introduced in some countries several decades ago (for example, Sweden, 1976; Denmark, 1981), while in other countries, foreign nationals will enjoy local voting rights for the first time in forthcoming elections. All countries require the observance of particular conditions that define the eligibility of non-EU citizens to participate in local elections as voters or candidates. The most general requirements are legal status of a minimum duration (usually five years) and that individuals have to register in order to vote. In some countries enfranchisement is restricted to immigrants who hold the citizenship of specific countries. A notable exception to these obligations is Ireland where, since 2004, third-country nationals who are 'ordinary residents' have enjoyed full local voting rights from the first day of their registration in the local register.

Three EU Member States have only enfranchised individuals from particular countries. In the UK, citizens of Commonwealth countries qualify to vote for local elections. In Spain and Portugal only those citizens of countries which have signed a mutual agreement to grant local voting rights can participate in local elections. In 1996, for example, Portugal introduced the immigrants' right to vote and stand for election at the local level. However, only citizens from some countries are entitled to this political participation (namely Argentina, Brazil, Cape Verde, Chile, Israel, Norway, Venezuela, Uruguay and Peru) because enfranchisement is based on the principle of reciprocity between states.

The granting of voting rights does not appear to be influenced by the size of the immigrant population, nor by its composition. It is not subject to how mature the migration history of the Member State is, although long experience with migration seems to encourage local enfranchisement. Local voting rights are partly related to post-colonial ties. Also, states with a strong ethnic or national element tend to be in the group that denies local voting rights, even though there is a certain trend towards local enfranchisement of immigrants in the European Union.

Final remarks

This chapter has provided a comparative overview of immigration in the EU-25. More specifically, we have proposed a typology of countries based on their migration experience during the last decades. We have thus distinguished between old hosts, recent hosts, countries in transition, small island countries and non-immigration countries. We have also constructed a typology of migration pathways, that is, sets of opportunities, policies, motivations and constraints that open a specific channel where people and information flow more easily and more intensely than when these conditions are not in place. The notion of migration pathways is tentatively introduced here. Its scope or usefulness needs to be developed further in empirical research (see also Psimmenos and Kassimati, 2003). Our two typologies aim at providing a broad description of migration phenomena and a first attempt at creating up-to-date theoretical classifications that respond to contemporary

European realities. The last section of this chapter has given some brief insights into two main issues of immigrant integration, notably the question of naturalization and the issue of local voting rights. These are only two among several important contested issues that European Union countries need to address if they are to respond to the challenge of migration for the twenty-first century. We believe that this book is an important first step in the systematic exploration and comparison of contemporary European migration. Further comparative research is needed to develop the field of comparative migration studies, highlighting the similarities and differences between the EU-25 as regards migration and migrant integration.

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