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Comments

**on the Communication from the European Commission
on Immigration, Integration and Employment (COM (2003) 336 final)**

1. Our organisations represent churches throughout Europe, Anglican, Orthodox, Protestant and Roman Catholic, as well as Christian agencies particularly concerned with migrants and refugees. As Christian organisations, we are deeply committed to the dignity of the human individual, the concept of global solidarity and the idea of a society welcoming strangers.
2. Like the history of the other Abrahamic religions, the history of Christianity is since its early days a story of migration and a story of integration of foreigners into new hosting societies. Through their world-wide-community churches have been active in the cross-border movements of persons as migrants over centuries. In the history of Europe after the Second World War churches were among the first providing shelter and integration to the millions of refugees and later hosting, informing and integrating migrant workers.
3. We therefore wholeheartedly welcome the intention of the European Commission to take stock of the current state of play regarding the integration of third-country nationals, to outline future chances and challenges in the field of integration and to suggest future policies for integration.

Executive Summary

4. Christian organisations welcome the analysis and conclusions of the Communication by the Commission and subsequently the European Council of Thessalonica of June 2003. Particularly the efforts for regular exchange on this matter through annual reports regarding integration will be beneficial.
5. The notion, that integration is a two-way process of migrants and society, is highly relevant. Christian organisations hope that this will be reflected in future efforts and programmes for integration.
6. Christian organisations underline the analysis that successful integration is linked to a coherent migration policy. The imbalance in the present EU migration framework, the

hesitation to transpose the anti-discrimination legislation into national legislation and extend the provisions to third country nationals have serious consequences for the perception of migrants as being a risk rather than benefit. Equal treatment, rights of legally residing migrants, a transparent immigration framework, and safeguards for fundamental rights of migrants regardless of their status are vital.

7. Family life is recognised as an important factor for successful integration. Thus, Christian organisations reiterate their criticism of the Council Directive on Family Reunification of 2003, which limits the right of living in family unity and falls short of the Member States' obligation to protect the family.
8. Inter-cultural and inter-religious competence needs to be developed among all stakeholders. Instruments of mediation in unavoidable conflicts ought to be developed.
9. The role of civil society, migrants' associations, NGO's and social organisations should be considered for the integration processes. NGO's will also have to give more visibility to the inter-cultural and inter-religious realities of our societies.
10. The specific needs of particular groups of migrants, refugees and persons under international protection, need to be safeguarded. Integration programmes should be started as early as possible to overcome specific difficulties of this group of persons. Opening up perspectives and choices to foster self-esteem and self-empowerment is of particular importance.
11. We expect Member States to live up to the goals expressed in the Communication and the subsequent Thessalonica Council Conclusions. If the statement is taken seriously, that integration is a two-way process, Member States ought to act now and develop appropriate programmes.

A CALL TO RE-ADJUST THE BALANCE IN MIGRATION AND ASYLUM POLICY

12. In recent years our organisations have issued a series of comments on the developments in the field of asylum and migration policy in the EU as well as in member states. In these comments we have repeatedly expressed concern about an increasing imbalance between "progress" in areas such as technical cooperation for border control or visa standards, deportations or cooperation with third countries to combat irregular migration on the one hand, and a standstill in harmonisation of third country nationals' rights and the establishment of channels for legal migration on the other hand. We are therefore very pleased to note that the Communication, while recognising the existing problem in the field of migration, is acknowledging and spelling out the enormously positive potential of migration – e.g. in the field of employment, innovation or demographic development. We also appreciate the recognition of the obligation of EU member states towards those in need of international protection. We believe that the Communication can be an element of returning to the balanced approach in the migration field outlined in the Tampere conclusions and in the Communication on a Community Immigration Policy (COM (2000) 757 final).
13. In this context we would very much welcome it if representatives of EU institutions and member states had the courage and vision to introduce and explain the positive aspect of migration, e.g. for social security systems in Europe, as well as the need for a commitment to those in need of international protection in the public debate on migration, which is currently widely dominated by xenophobe sentiments, myths and prejudice and lack of accurate information.

IDENTITY AND DIVERSITY ARE TREASURES...

14. As the Communication correctly outlines, labour market needs and the stabilisation of social security systems, which are currently under strain due to the demographic development, are among those areas where immigration can play a positive and decisive role.
15. We share the view of the Communication that immigration can be one important element of a strategy, which addresses the challenges of ageing populations and decreasing working population in most European countries. Given the demographic development in 25 EU member states as well as the accession candidates Romania and Bulgaria, plus the countries of the “wider Europe”, immigration is likely to take place from countries outside Europe, migrants will rather come from cultures and societies which traditionally had limited contact with European culture and society, while particularly Central and East European countries inside and outside the EU will have to cope with immigration as well.¹
16. In this context the process of integration in European societies will remain crucial for social and cultural coherence. The starting point for this differs from country to country: while for some EU member states immigration and integration are a phenomenon which has been known for decades, other EU member states have only very recently become countries of immigration. In a couple of EU member states the debate – and programmes - on integration have only begun very recently, while in other EU member states it is a well-developed debate.
17. There is a strong need for societies in Europe to define what actually constitutes the core of their own culture and society. National and cultural identity, their development and perception differ widely from member state to member state. It is however high time to recognise that in none of the EU member states we can speak of one uniform society and one exclusive culture. Rather on the contrary, culture and society in Europe are today characterised by a growing diversity in cultures, lifestyles, forms of linguistic expression, philosophies, religions and beliefs. Culture and society are in a constant highly dynamic process of development. Notions of “normality” have changed and are changing. This dynamic opens up possibilities, but also creates uncertainties. When confronted with persons from other regions of the world, European societies are often unable to spell out what they regard as their own uniting values, which should be binding for all persons wanting to belong to this society. We believe that European societies should embark on debates about the uniting core values of their society and at the same time embrace and cherish the principle of diversity - just as the preamble of the draft for an EU constitution identifies “united in diversity” as a guiding principle for the uniting Europe.

INTEGRATION: A CHANGING AND DYNAMIC CONCEPT...

18. In the debate on integration it is important to acknowledge that there cannot be one uniform, all-encompassing concept of integration. Integration is a concept and process which must be understood in its very concrete personal, local and historic context. The communication outlines reference points which constitute important factors for integration: social integration, civic participation, language competence and integration as a two-way process. While we would underline that these are important factors we believe

¹ See e.g. Council of Europe, Recent demographic developments in Europe 2002, Strasbourg, 2002

that a successful integration process and the perception of a successful integration cannot exclusively be described and explained by these elements.

19. The perception of integration is contradictory: in the broad public debate it is often perceived that immigrants from other EU member states are well-integrated and their integration does not pose a challenge while immigrants from non-EU member states are perceived as rather socially excluded, living in “parallel societies”, do not have sufficient linguistic competence and are in general not integrated. The available data however suggest that the “second and third generation” of immigrants from EU countries are often among those most severely affected by unemployment or drop out of the educational system. Clubs and societies of EU immigrants are seen as an expression of a vivid social contribution to the host country while similar institutions of non-EU immigrants are criticised as phenomena of a “parallel society”.
20. In this context it seems obvious that all groups of immigrants need efforts and measures for integration. On the other hand it seems fair to assume that a generally positive attitude to certain groups of immigrants will influence how much they are seen as integrated.

REQUIRING A HOLISTIC APPROACH

21. In this complex setting we highly appreciate the Communication’s concept of a holistic approach to integration and a two-way process. While it is fair to expect from immigrants that they make efforts for integration, it is only just to assume that they at the same time acquire rights. In this context it is also important to recall that migrant workers and their families should irrespective of EU or national legislation enjoy a set of unalienable rights according to the UN “Convention on the Rights of all Migrant Workers and their Families”. Too often, migrants were and are expected to acquire the tools traditionally associated with successful integration (e.g. language, formal education) and to contribute to host society (e.g. taxes, contributions to social and health security) without being offered adequate mechanisms for formal learning as well as means of civic participation (e.g. voting rights, right to acquire citizenship, places to express their religious identity). A successful integration without doubt requires skills required for the labour market and material conditions such as adequate housing, as well as sufficient linguistic competence.. We therefore welcome the Communication’s attempts to outline how existing schemes on national and EU level, such as European Employment Strategy, National Action Plans for Social Inclusion, ESF and EQUAL could best be used to facilitate integration.
22. A mainstreaming of integration into these existing programmes could indeed be an important tool. In our view it would be highly recommendable to seek the advice of immigrants’ associations as well as specialised services taking care of migrants’ needs when these schemes are further developed. As outlined above measures of social inclusion and integration should not only aim at those groups which are in the public opinion perceived not to be integrated but at all those suffering from particular difficulties due to their migration background. We welcome the acknowledgement of the need to recognise and properly assess the formal and informal qualifications of migrants as a means to facilitate access to the labour market. This commitment, however, requires the development of proper measures of recognition and assessment of qualifications. A useful example might be the qualification training which precedes the recognition of diplomas as developed e.g. in Scandinavian countries, which enable a process through which existing qualifications and skills can be converted into the EU context.
23. Apart from achieving a certain level of qualifications and social conditions, integration first and foremost requires possibilities for participation. Integration is more likely when

people arriving as “foreigners” have the option to become citizens after a specified time. The concept of “civic citizenship” provides some helpful suggestions for such a process of becoming citizens. However “civic citizenship” should not be used as a token for full integration as “ordinary” citizens, which should be granted to immigrants who demonstrate their willingness to become citizens. In this context we can only express our deep respect and admiration for the vast majority among generations of immigrants who have despite extremely difficult conditions fairly successfully integrated and contributed to the material as well as cultural and spiritual richness of Europe. As we welcome new measures that facilitate integration of migrants and guarantee their social and political rights, we would also like to point to the necessity to implement the already existing tools to their full extent.

INTEGRATION NEEDS COMMITMENT FROM ALL SIDES...

24. Individuals and nations are facing the challenge of significant changes and of ever-increasing cultural diversity whilst trying, without damaging their historical identity and cohesion, to manage the inevitable transformation of their societies into intercultural societies. At the heart of this challenge is the need for all persons and groups – ethnic, cultural and social - to strive to develop intercultural competence.
25. Acquiring linguistic competence actually becomes much more desirable for an immigrant if it can be put to the fullest use, e.g. in the life of sports clubs, associative life, in political debates. On the one hand the possibility for civic participation depends on the legal provisions, which would enable immigrants to participate fully in their host society (e.g. citizenship laws, work permit), but also requires a generally positive and open setting of mindsets in migrant-receiving countries, where migrants are too often seen as a mere commodity for the labour market, or even an undesired part of the population, as a group of people exploiting the host society. The transformation of European societies into welcoming societies requires efforts of all stakeholders – state institutions, politicians, employers and trade unions, NGOs, associations, churches. Creating a socio-political climate in which integration of migrants is seen as desirable would essentially require that political actors abstain from using xenophobic stereotypes and scapegoat-ism as elements of their political discourse, as is presently too often the case in EU member states.
26. In this context we whole-heartedly welcome the efforts of the European Union and member states to combat discrimination. However we are deeply concerned that until today only a few member states have transposed the Article 13 related anti-discrimination directives 2000/43/EC (adopted in July 2000) and 2000/78/EC (adopted in December 2000) into national legislation. A verbal commitment to anti-discrimination, which is not translated into concrete action, will in our view have rather harmful effects and not contribute to a climate which would be favourable to integration.

...AND THE WILLINGNESS TO DEAL WITH CONFLICT

27. In the debate on integration it should also be noted that - even if all actors take an open and cooperative approach to integration - integration is not and will not be an easy process. While a dynamic and open concept of one's own personal cultural or national identity will most likely be beneficial to individuals and society at large in the long run, the concrete daily challenge of living in a changing and diversifying society can be very demanding for individuals and society. Integration and the diversification of lifestyles in society, which is connected with it, may lead to insecurity, especially among those members of society who are experiencing the change of social environments in many

areas – due to a range of very different reasons. Individuals often find themselves struggling with change, find themselves alienated in their own country and cities and may ask themselves how much plurality a society can sustain and where they find their space. Different lifestyles, convictions and social habits might not always be reconcilable – it might not always be possible to find a balance between identity and diversity. Often Christians themselves find the consequences of immigration and integration difficult to accept: what does the public call of the muezzin mean for a society, which traditionally was shaped by Christianity? Integration therefore is and will be a process which potentially creates conflict. While such conflict can be a positive and creative element, if for example it is properly mediated and developed in a joint process, a failure to address emerging conflicts may lead to rather dangerous situations. All actors involved in integration therefore need to develop mechanisms to address such conflicts – with the aim of solving the conflict; if this is not (yet) possible a forum for mediation of intermediary solutions could be helpful.

INTEGRATION NEEDS TO START AS EARLY AS POSSIBLE...

28. From our experience we can affirm the analysis that migration is often initially expected to be of a temporary nature by both, the migrant and the host society; in reality it often turns out to be permanent. Often only a decade after their arrival, migrants realise that they are not likely to go back “home”, refugees or persons under subsidiary forms of protection often find themselves in protracted situations for years, if not decades. We therefore wish to underline that efforts of integration should be extended to new immigrants at the earliest possible moment, irrespective of their residence status. Particularly asylum seekers should be included, as the procedures for determining the asylum claims still take a very long time, as many Member States of the EU consider them with suspicion and the conviction that they did not have a true reason to stay. Alienation with the host society and culture shock are common during the first months after arrival and can only be overcome with great difficulty at a later point. We are convinced that including all migrants in integration efforts will not only help to recognise the migrants’ human rights, but also help to reduce the emergence of parallel cultures.

...AND NEEDS TO INVOLVE THE FAMILY

29. In this context we would once again underline that one important aspect of a successful integration is family life. Indeed the Communication is correct in stating that “family ...plays a central role in the integration process as it represents a fixed point of reference for immigrants in a new host country”. If the whole family is to play an active role in integration, the whole family needs to acquire certain rights, such as an independent residence status as soon as possible. The right to family life takes priority over the family members capability of learning the language.

30. It is apparent that the Council Directive on Family Reunification of October 2003 gives reasons for serious concern in this aspect as it limits the right to family life rather than protecting it and infringes children’s rights. Particularly in the interest of integration of migrants in European societies, the value and protection of families must be upheld, and thus we reiterate our call for compliance with international rights standards for this directive.

THE ROLE OF RELIGION IN INTEGRATION

31. Another aspect, which in our view deserves closer scrutiny, is the role of religion as a tool or impediment for integration.
32. We know from our own work that being welcomed in the community of the local church can be a key moment of successful integration for an immigrant; an invitation of a parish extended to a community of another faith or a Christian community of different nationality or ethnic background, can be the crucial point for integrating a community of another faith / nationality/ other ethnic background. Encounters with a community of another faith or another national/ ethnic background have been inspiring and enriching for many churches. In many places Christian Churches, their theology and praxis have changed and been revitalised due to the influence of black and migrant communities
33. However there is also the reality of confrontation between religious communities, of misunderstandings and the use of religion as an instrument of division and stirring up hatred. Ignorance and the rise of fundamentalism are often the background of tensions between groups of different faiths. Often, Christian congregations and churches are also still hesitant, sometimes hostile, to meet with Christians of other denominations and traditions, even more when it comes to other faith communities. This is sometimes also true for religious communities of “newcomers” in society, who feel they have to protect their religious heritage.
34. In public perception belonging to a different religion is often regarded as an element blocking full integration. An immigrant might be economically successful, socially integrated, fluent in the language of the host country and in many other ways be an example of integration – the fact that s/he belongs to another religion is perceived as an indication of an “unwillingness” or inability to integrate. In Europe this is most commonly the case with Muslims. In our view it is necessary to underline that none of the world religions would as such be an obstacle to integration into European society. But it is true that in all religions there are those who seek to protect their religion from outside influences by upholding their traditions in contrast to others.
35. In this context we reaffirm our commitment to inter-religious as well as ecumenical dialogue and encounter in a spirit of openness, sincerity and tolerance. We also confirm our willingness to share the enrichment which we have received from interreligious encounter, as well as our doubts and our own problems, to develop a clear understanding of our Christian role in an increasingly secularised and multi-religious Europe. The work undertaken on the challenges of a value-based approach in a multi-religious Europe, e.g. the “Soul for Europe” initiative or the work on “Islam in Europe” by the Conference of European Churches and the Council of European Bishops’ Conferences deserve the greatest possible attention. We also affirm our commitment to a regular, open and transparent dialogue with national and European secular institutions on, among other issues, an increasingly multi-religious Europe.

THE NEEDS OF SPECIFIC GROUPS OF MIGRANTS

36. The Communication correctly outlines the needs of refugees and persons enjoying international protection as a specific group of migrants in integration policy. From our work with this group of people we can affirm that refugees/ persons enjoying international protection often bring with them a high level of education and skills, both formal and informal ones. As pilot projects such as the FREE (Fund for Refugee Education and Employment) have shown, these skills and qualifications can have extremely beneficial effects for the country in which refugees/persons enjoying

international protection are granted protection. Recognising and using the potential of refugees / persons enjoying international protection also constitute an important element of self-empowerment for these persons and can also be crucial for example in overcoming the traumatisation of victims of torture or violence. We thus support the idea of specialised programmes for refugees. We would equally underline the need for legal provision which would allow refugees to put their potential to the fullest use (e.g. by granting work permits, recognition of diplomas). Given the lengths of refugee determination procedures in EU member states we strongly recommend opening up these provisions for refugees whose claim is still under examination.

37. We welcome the openness with which the Communication acknowledges the reality and extent of irregular migration into EU member states. We have repeatedly underlined our conviction that open, transparent and accessible mechanisms of legal migration would help to reduce irregular migration. Such mechanisms would also help to dry out the hugely profitable criminal networks of smuggling and trafficking. The current imbalance of migration policies in the EU and the work of criminal networks are two important factors, which lead to the death of hundreds of migrants at the external border of the EU and the enslavement of thousands by trafficking networks each year. We reiterate our position that a person exercising his/her right to seek a better life should not be considered a criminal simply for doing so. We are pleased that the communication spells out that irregular migrants and their families regardless of their legal status should enjoy universal human rights, such as the right to education and health-care. We would like to add that exercising these rights should neither directly nor indirectly lead to penalisation.
38. In addition, legislation should make provisions which would allow irregular migrants to receive due reward for their work, e.g. to receive the salary which they were promised and the benefits associated with it. Presently, undocumented migrants are often deprived of their earnings and have little possibility of claiming them, due to their status as being undocumented.
39. A point of specific concern to us is the legal and financial situation of assistance organisations, which help to prevent a complete social disintegration of persons living in irregular situations. From our experience it seems essential that organisations assisting undocumented migrants should not be penalised. We would also welcome provisions which would allow that governmental or EU funding can at least partly be used to care for the fundamental rights of undocumented migrants. A situation where organisations such as our members are legally and financially no longer in a position to assist undocumented migrants will create enormous suffering among this group of most vulnerable persons and most possibly lead to a situation resulting in rising of crime and social disintegration
40. In our view it is helpful that the Communication acknowledges problems arising when large numbers of irregular migrants are present in EU member states. In this context we would once again like to repeat our call for an exchange of best practice on mechanisms such as regularisation campaigns or case-by-case solutions. We recognise the different traditions in this area and are therefore hesitant to recommend any specific mechanism as the only tool for all member states. We are however convinced that some kind of regularisation mechanism is needed in all member states if integration is to be achieved and that any legislation prohibiting regularisation procedures will inevitably result in the growth of informal ("grey") sectors of society – with negative implications for both member states and persons in irregular situations.

COORDINATION, ACCESSIBILITY AND TRANSPARENCY AS KEY ELEMENTS OF AN EU APPROACH

41. Regarding the policy options on EU level we support the idea of an annual report on Immigration and Integration as suggested in the Thessalonica conclusions. The policy coordination in the area of integration between member states should indeed be strengthened, and we would welcome an ambitious programme for the open method of coordination in this field. The identification of common basic principles for integration as suggested by the Thessalonica conclusions would be a good starting point. In this context we would emphasize that the open method of coordination can only be a meaningful tool if accompanied by a harmonisation of legislation on migration throughout the EU on the highest possible level. We have to repeat our concern about the de facto failure to harmonise areas such as family reunification and immigration and the tendency to agree on common standards on the lowest possible level rather than to use best practice examples as standards.
42. Concerning the instruments of cooperation and exchange of information we would welcome an approach which is transparent and aims at involving all stakeholders. While the establishment of a network of national contact points on integration and the European Migration network are certainly useful tools, it will remain crucial that the contact points of these networks are known to the integration actors on national level, that they are accessible and their work is carried out with the broadest possible involvement of civil society – such as migrants' associations or specialised NGO's.
43. Social organisations are “natural” places of integration. However, social organisations also need to give more visibility to the inter-cultural realities in our societies by applying equal-opportunity policies, employing migrants at all levels of the organisations, and cooperation with associations of migrants.²
44. We welcome the Commission's initiative to launch a programme of pilot projects/ best practice on integration. However in view of the experiences of our constituency with the programme launched in July 2003, we would suggest that the timing and format of the procedures for such a programme are chosen in such a way that organisations which do not deal with EU programmes on a daily basis also have a fair chance of participating.

CONCLUSIONS

45. In summary we can only congratulate the European Commission on the analytical effort undertaken and political commitment to a comprehensive and holistic approach to integration expressed in the Communication. We believe that the Communication will be a helpful instrument in the debates on integration in Member States. We commit ourselves to contributing to the ongoing debate as our members will also be contributing in the Member States.
46. We expect the Member States to live up to the goals expressed in the Communication and the subsequent Thessalonica Council Conclusions. If the statement that integration is a two-way process is taken seriously, then the Member States ought to act now.

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² as an example, we wish to refer to the current discussion process within Caritas Europa on integration which will be outlining practical guidelines. A more elaborate paper on “The integration of Migrants and Refugees” is available on the website of Caritas Europa, www.caritas-europa.org.